

# MONROE COUNTY BOARD OF SUPERVISORS



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January 22, 2014

Environmental Support, Inc.  
Attn: Mr. Don West  
8601 Georgia Avenue, Suite 500  
Silver Springs, MD 20910

PHONE (662) 369-8143 • FAX (662) 369-7928  
POST OFFICE BOX 578  
ABERDEEN, MISSISSIPPI 39730

R04-14-A-058

Re: Site-Specific Assessment Grant Application, Hazardous Substances  
Monroe County, Mississippi

Dear Mr. West:

On behalf of Monroe County, Mississippi, I am pleased to submit this proposal for an EPA Brownfields Site-Specific Assessment Grant for Hazardous Substances. The County is requesting \$350,000 to conduct Phase I and II Environmental Sites Assessments (ESAs) on a 307-ac parcel of the former Gulf Ordnance Plant located in the City of Aberdeen, Monroe County, MS. The parcel is jointly owned by Monroe County and the City of Aberdeen and is the location of Prairie Industrial Park-North.

Monroe County has been in a state of declining population along with more of our workforce commuting to other counties as a number of large employers have closed or downsized. Our unemployment rate remains high compared to most counties in Mississippi. We have been actively trying to attract new business to our Prairie Industrial Park-North. The real and potential contamination at the site has made it extremely difficult to generate any interest since it is a Formerly Used Defense Site (FUDS) with known contamination from explosives and heavy metals, and reportedly buried unexploded ordnance in some areas.

In addition to the loss of jobs, natural disasters have also taken their toll in our communities. Twice in the last five years, President Obama has declared a Major Disaster in Monroe County due to severe storms, tornadoes, straight line winds and flooding. The most recent was in April 2011, when two tornados touched down, each causing widespread damage in separate locations. The larger EF5 tornado struck the town of Smithville with an estimated peak wind rate of 205 mph, killing 16 people and destroying 153 homes and a school.

An EPA Site-Specific Hazardous Substances Assessment grant will allow Monroe County to start addressing actual and perceived contamination at the former GOP site/Prairie Industrial Park-North site which is currently inhibiting economic development. Once cleared or cleaned up we can attract new employers that create job opportunities, bringing people back to the community.

Thank you for your consideration of the Monroe County Brownfields Assessment Grant proposal and the Prairie Industrial Park-North redevelopment initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "Birkpatrick", written over a horizontal line.

Billy Kirkpatrick  
President, Monroe County Board of Supervisors  
Enc. EPA Brownfield Assessment Grants Proposal

**APPLICANT INFORMATION:**

- a. Applicant Identification:  
Mailing Address: Monroe County  
P.O. Box 578  
Aberdeen, MS 39730
- Phone: 662-319-5995  
Fax: 662-369-7928
- b. DUNS Number: 030416986
- c. Funding Requested:  
i) Grant Type Assessment  
ii) Federal Funds Requested \$350,000  
iii) Contamination Hazardous Substances  
iv) Assessment Type Site-Specific
- d. Location: Monroe County, Mississippi
- e. Site-specific Information: Former Gulf Ordnance Plant (GOP)/Prairie Industrial Park-North  
10015 Worldwide Drive,  
Aberdeen, MS 39730
- f. Project Contacts:  
i) Project Director:  
Mailing Address: Mike King, County Administrator  
Monroe County  
P.O. Box 578.  
Aberdeen, MS 39730  
Phone: 662-319-5995  
Fax: 662-369-7928  
Email: mking@monroecomms.com
- ii) Highest Ranking Elected Official:  
Mailing Address: Billy Kirkpatrick, President, Board of Supervisors  
Monroe County  
P.O. Box 578.  
Aberdeen, MS 39730  
Phone: 662-319-5995  
Fax: 662-369-7928  
Email: mking@monroecomms.com
- g. Date Submitted: January 22, 2014
- h. Project Period: 2014-2017
- i. Population: Monroe County—36,989  
City of Aberdeen—5,612  
Target Area--116
- j. Other Factors Checklist: Attached

## RANKING CRITERIA FOR ASSESSMENT GRANT

**1. Community Need**—Named for President James Monroe, Monroe County, established in 1821, was the first in north Mississippi and one of the oldest of Mississippi's 82 counties. Monroe County's major industries included cotton, hardwood and the manufacture of fine jewelry resulting in a bustling steamboat trade by the 1860's making its current county seat, Aberdeen, the largest city in Mississippi. The wealth that came from cotton built great homes and lavish mansions, many of which still dot the city's tree lined streets today. Another "building boom" at the turn of the century created magnificent early Victorian dwellings along what is now known as "Silk Stocking Avenue."<sup>1</sup> The village of Prairie, located 3 miles (mi) southwest of Aberdeen, began as a trade and service center that produced cotton, cattle and hay beginning in the 1840s. Rich with history, two Civil War skirmishes were fought in Prairie due to the railroad which later attracted a munitions plant with the U.S. entry into World War II. In the early 1940s, the U.S. Government acquired a total of 7,840 acres (ac) in Prairie for an ordnance plant that would later become one of the largest ammunition manufacturing plants of World War II. Several sections of land were condemned and nearly 60 families were moved. Soon following, construction began on a vast scale resulting in a short-lived burst of prosperity during the war. At its peak, the plant employed as many as 10,000, mostly women, and many credit the Gulf Ordnance Plant (GOP) for the recovery of the surrounding area from the economic hardships of the Depression.<sup>2</sup> Following the short lived prosperity during the peak production of the GOP, Prairie was not able to progress as a distinct community with most people leaving in search of work.<sup>3</sup> Today the Prairie Industrial Park-North in Aberdeen lies within the bounds of the former GOP site. Although the county's population is 70% rural and 30% urban, Monroe County's largest sectors for employment are education, health and social services (26.1%) manufacturing (24.4%) and retail (11.6%).<sup>4</sup> Between 2011 and 2012 the civilian labor force in Monroe County shrank and in 2011, commuters into Monroe County for work numbered 2,271 while commuters that left Monroe County to surrounding counties for work numbered 5,013.<sup>5</sup> In fact, residents are leaving Monroe County resulting in a -0.6% population change from 2011-2012 while the adjacent 5 Mississippi counties had population changes in that same time period ranging from -0.1% to +1.7%.<sup>6</sup> Recent closing or downsizing of area employers has contributed to high unemployment, the large number of commuters and declining population: Lane Furniture<sup>7</sup> (1,400 jobs), Hickory Hills Furniture Co.<sup>8</sup> (257 jobs), Omega Motion<sup>9</sup> (172 jobs), Sara Lee<sup>10</sup> (155 jobs), and Townhouse Home Furniture<sup>11</sup> (125 jobs). In addition to the loss of jobs, natural disasters have also taken their toll. Twice in the last 5 years, President Obama declared a Major Disaster<sup>4</sup> in Monroe County due to severe storms, tornadoes, straight line winds and flooding. The most recent was in April 2011, when two tornados touched down, each causing widespread damage in separate locations. The larger EF5 tornado struck the town of Smithville with an estimated peak wind of 205 mph.<sup>12</sup> The tornado ripped through Smithville killing 16 people, destroying the local water system, most of the local businesses, 4 churches, the Town Hall, the police headquarters, 153 homes and the local school.<sup>13</sup> An EPA Site-Specific Hazardous Substances Assessment grant will allow Monroe County to start addressing actual and perceived contamination at the former GOP site/Prairie Industrial Park-North site which is currently inhibiting economic development. Once cleared or cleaned up the County can attract new employers that create job opportunities, bringing people back to the community.

**a. Targeted Community and Brownfields,** i. Targeted Community Description, ii. Demographic Information, iii. Brownfields—The former Gulf Ordnance Plant (GOP) is located near the City of Aberdeen in the former town of Prairie, in Monroe County, MS. During World War II, a government-owned, contractor-operated ammunition plant was operated by Proctor and Gamble at this site from 1942-1945. Activities at the plant included loading and assembly of small arms ammunition, manufacture of large projectiles, rockets, and bombs, and ordnance storage and demolition. In August 1945 all work on production lines was terminated and decontamination for shutdown at the GOP began. Prior to demilitarization of ammunition, explosives and other components, 6,931,698 items of ammunition and 804,309 pounds (lbs) of bulk explosives and propellants were stored on-site. Burn areas, trenches, and burial pits were associated with ordnance demolition. The plant was declared surplus on January 1, 1946. The site was declared a Formerly Used Defense Site (FUDS #A04MS001206).<sup>14</sup> The Decontamination Certificate issued July 26, 1946 stated that the site was returned to standby condition, but further decontamination would be required. By August 28, 1946 all demilitarization, burning, and demolition operations at the plant were declared complete. In June 1946, 3,120 ac of the site were transferred to the State of Mississippi for establishment

of a veteran's training school with the conditions prior to occupation that included a release of liability of the War Assets Administration and the exclusion of the South Burning Ground from transfer, since it could not be decontaminated. In 1948 a report stated that the State of Mississippi had not completed decontamination of some of the buildings prior to use. Portions of the site were transferred to the Prairie-Aberdeen Separate School District (approximately 19.4 ac), and Monroe County (approximately 20 ac in road easements). In 1953, the 3,120-ac parcel sold to the State of Mississippi was reacquired by the Air Force. Approximately 1,750 ac of this were leased to the Mississippi Experiment Station run by Mississippi State University. The Air Force portion of the site was used as the Prairie Vehicle Storage Station until the property was gradually declared excess by the General Services Administration (GSA) and disposed from 1962 through 1976 with Monroe County and the City of Aberdeen, MS jointly acquiring approximately 308 ac on Feb 11, 1964. It is this 308-ac former GOP parcel, minus 1 ac that the City of Aberdeen uses for materials storage, for which Monroe County is requesting EPA Brownfields Assessment funds. Within the bounds of the remaining 307-ac parcel, was the GOP "metals plant," the possible burial of 100-lb practice bombs, and a 100-lb bomb manufacturing line.<sup>14</sup> The "metals plant" also known as Prairie Metals & Chemical Co (EPA ID MSD980839898) was proposed for National Priorities List (NPL) status in 1984. After a removal action, a site inspection resulted in the site being classified as No Further Remedial Action Planned (NFRAP) on March 31, 1986 because it didn't qualify for the NPL.<sup>15</sup> Additionally there are numerous former bunkers located on the site. According to a 2007 Site Investigation (SI) Report completed for the U.S. Army Corps of Engineers (USACE), Mobile District for the entire former GOP,<sup>14</sup> recommendations for areas within the County's 307-ac parcel include: a Remedial Investigation(RI)/ Feasibility Study (FS) with additional sampling for explosives in the 100-lb bomb line area because pieces of trinitrotoluene (TNT) and nitrocellulose or nitroglycerin were found during a site visit for a 1991 Preliminary Assessment (PA); a geophysical survey in the area where 100-lb bombs are possibly buried, and an RI/FS near the former Storage/Machine Shop area because the explosive pentaerythritol tetranitrate (PETN) was identified in surface soil as well as the metals antimony, copper, lead and zinc. Situated within a 1-mi buffer of the 307-ac former GOP parcel (Target Area) are several sites reporting to EPA which include 1 Air Facilities System (AFS) site, 3 Toxic Release Inventory (TRI) sites, 3 Resource Conservation and Recovery Act (RCRA) generators, and 1 Water Dischargers (PCS & ICIS) site.<sup>16</sup> These

**Table 1: Target Area Demographics** <sup>16,17,18</sup>

	Target Area (1-mi buffer)	City of Aberdeen	Monroe County	Mississippi	US
<b>Population</b>	116	5,612	36,989	2,967,297	308,745,538
<b>% Female</b>	48.0	<b>54.4</b>	<b>52.5</b>	51.4	50.8
<b>% Minority</b>	<b>82.0</b>	<b>70.7</b>	32.3	39.9	27.6
<b>% African-American</b>	<b>82.0</b>	<b>70.1</b>	30.9	37.6	12.6
<b>% Children &lt;5 yrs</b>	3	<b>7.6</b>	6.7	7.1	6.4
<b>% Seniors &gt;65 yrs</b>	9	<b>15.9</b>	<b>15.8</b>	12.8	13.0
<b>% Indiv in poverty</b>	18.6	<b>36.2</b>	20.9	22.3	15.0
<b>Per Capita Inc (\$)</b>	<b>14,933</b>	<b>16,200</b>	<b>18,598</b>	20,670	28,051
<b>% No H.S. Diploma</b>	<b>21.0</b>	18.2	<b>29.2</b>	19.1	16.2
<b>% Renters</b>	<b>36.0</b>	<b>39.7</b>	24.4	30.4	34.9
<b>% Annual Unemployment 2012</b>	---	---	<b>11.4</b>	9.1	8.1

sites include a resin compounding facility, a boat building facility, 2 vehicle parts manufacturing facilities and a wastewater treatment facility. Adjacent to the County's 307-ac Target Area, there was also a former manufacturer of a pesticide for red ants. There are 2 schools and 2 churches<sup>16</sup> within the 1-mi buffer of the site where sensitive populations could potentially be exposed to contamination. In addition to the potential health concerns from blowing dust and potential impacts to groundwater, Monroe County is concerned about the liability it has inherited with this facility due to the presence of the buried ordnance and surface

contamination. The former GOP site is also a detriment to the development of Prairie Industrial Park-North, but also Prairie Industrial Park-South, across State Highway 382 from the site.

As seen in Table 1, the Target Area and City of Aberdeen have over twice the percentage of minorities and African-Americans than Monroe County, the state, or country. The percentage of children < 5 years (yrs) of age is higher in Aberdeen than the county, state, or country. Both Monroe County and the City of Aberdeen have higher percentages of women and seniors > 65 yrs than the state or country. These sensitive populations indicate that contamination from the former GOP is an environmental justice issue that should be addressed. Individuals living in the Target Area are less likely to have completed High School than the City, state or country. Children, senior citizens, and less educated persons have the least means to protect themselves against exposure to contamination and the least ability to seek help when exposed.

iv. Cumulative Environmental Issues—The 5 top causes of death in Monroe County in 2007 were heart disease, cancer, accidents, strokes and flu/pneumonia.<sup>19</sup> As illustrated in Table 2, the GOP Target Area has a much higher respiratory hazard risk than Monroe County at large and the state. Monroe County has a higher neurological hazard risk than the state. Monroe County is ranked 31<sup>st</sup> out of Mississippi's 82 counties for health outcomes.<sup>20</sup> The County has higher morbidity percentages, higher percentage of low birth weight babies, higher mortality rate, and higher childhood leukemia (black males) rate than that of Mississippi.

**Table 2: Target Area and Monroe County Health Statistics** <sup>16, 20</sup>

	<b>GOP Target Area (1-mi buffer)</b>	<b>Monroe County</b>	<b>Mississippi</b>
<b>Population</b>	116	36,989	2,967,297
<b>Respiratory Hazard Risk</b>	<b>1.50</b>	1.08	1.22
<b>Neurological Hazard Risk</b>	0.03	<b>0.07</b>	0.06
<b>% Adults reporting poor or fair health (morbidity)</b>	---	<b>25</b>	22
<b>%Low Birth Weight</b>	---	<b>12.4</b>	12.0
<b>Mortality Rate/1000</b>	---	<b>10.66</b>	9.5
<b>Childhood leukemia mortality rates/100,000 (black males)</b>	---	<b>8.09</b>	7.17

Twenty-one percent<sup>20</sup> of both Mississippians and Monroe County residents have no health insurance compared to 11% nationwide. The uninsured visit physicians less often than their insured counterparts, are less likely to receive care needed to manage chronic conditions such as diabetes or high blood pressure, and less likely to receive preventative health services, early diagnosis or care for acute conditions. A complicating factor is that Monroe County is designated a Medically Underserved Area (MUA) and a Health Professional Shortage Area (HPSA) for Primary Medical Care, Dental and Mental Health Care.<sup>21</sup> The loss of health care benefits through layoffs and plant closures has only compounded the problem. Other relevant health-related statistics for Monroe County and the City of Aberdeen include:<sup>22, 23</sup>

- ✂ Monroe County is the 3<sup>rd</sup> ranked county in the state of Mississippi for total environmental releases.
- ✂ Monroe County is the #1 ranked in the state of Mississippi for environmental releases to land.
- ✂ Monroe County is the 3<sup>rd</sup> ranked in the state for ozone-depleting potential.
- ✂ Monroe is the 3<sup>rd</sup> ranked county in the state for noncancer risk score.
- ✂ Monroe County is #1 in the state for releases to water of recognized development toxicants.
- ✂ Is in the 80<sup>th</sup> percentile of the U.S. counties for noncancer risk score.
- ✂ 2 of the top 5 facilities reporting total environmental releases and air releases in the county are in Aberdeen.
- ✂ 1 of the top 5 facilities in the county for production-related waste is located in Aberdeen.
- ✂ Average life expectancy in Monroe County is 74.4 yrs compared to 76.5 for U.S.
- ✂ Premature births are 17.5% compared to a range of 9.9-16.5% for peer counties and 12.7% for the U.S.

✂ Infant mortality rate is 7.8/1,000 live births compared to a range of 4.0- 10.3/1,000 for peer counties and 6.9/1,000 for the U.S.

✂ Lung cancer deaths are 57.2/100,000 compared to a range of 48.1-80.1/100,000 for peer counties and 52.6/100,000 for the U.S.

**b. Impacts on Targeted Community**—Based upon documented uses at the former GOP, findings from the SI, and current and previous uses of adjacent properties, the potential contaminants in the Target Area may include resins, solvents, alcohols, explosives, and heavy metals. Ingredients in the products can include phthalic anhydride, antimony, phenols, trichloroethene (TCE), acetaminofluorene, acrylonitrile, benzene, beryllium, lead, calcium cyanamide, bis-(chloromethyl) ether, and TNT. <sup>24</sup> The potential adverse health effects of these chemicals are indicated in Table 3.

**Table 3: Potential Health Effects<sup>25</sup> of Contamination from Target Area Brownfield Sites**

Contaminant	Carcinogen	Target Organs							
		Blood	Cardiovascular System	Central Nervous System	Eyes	Kidneys	Liver	Respiratory System	Skin
acetaminofluorene	Yes					X	X		X
acrylonitrile	Yes		X	X	X	X	X		X
antimony	No		X		X			X	X
benzene	Yes	X		X	X			X	X
beryllium	Yes				X			X	X
bis-(chloromethyl) ether	No				X			X	X
calcium cyanamide	No				X			X	X
lead	No	X		X	X	X			
phenols	No				X	X	X	X	X
phthalic anhydride	No				X	X	X	X	X
TCE	Yes		X		X	X	X	X	X
TNT	No	X	X	X	X	X	X	X	X

Table 2 shows that the GOP Target Area has a higher respiratory hazard risk than Monroe County as a whole aligning with the 5<sup>th</sup> top cause of death in the County, flu/pneumonia. Of the 12 contaminants with potential negative health impacts (Table 3), 5 are carcinogens, 9 target the respiratory system, and 4 target the cardiovascular system aligning with the 3 of the top 5 causes of death in Monroe County. Other relevant health-related statistics for the **GOP Target Area** include: <sup>22</sup>

- ✂ 1 of the top 3 facilities in the county reporting releases to water is in Aberdeen is located adjacent to the GOP.
- ✂ 2 of the top 5 facilities in the county with the highest cancer risk are located in Aberdeen with 1 located adjacent to the GOP.
- ✂ 3 of the top 5 facilities in the county with the highest noncancer risk score are located in Aberdeen with 1 located adjacent to the GOP.
- ✂ 2 of the top 5 facilities in the county releasing recognized carcinogens to air are located in Aberdeen with 1 adjacent to the GOP.
- ✂ 1 of the top 3 facilities in the county releasing recognized carcinogens to water is located in Aberdeen, adjacent to the GOP.

- ✂ 1 of the top 3 facilities in the county releasing recognized developmental toxicants to air is located in Aberdeen, adjacent to the GOP.
- ✂ 1 of the top 2 facilities in the county releasing recognized developmental toxicants to water is located in Aberdeen, adjacent to the GOP.
- ✂ 2 of the top 3 facilities in the county releasing recognized reproductive toxicants to air is located in Aberdeen with 1 adjacent to the GOP.
- ✂ 1 of the top 2 facilities in the county releasing recognized reproductive toxicants to water is located in Aberdeen, adjacent to the GOP.

**c. Financial Need**—i. Economic Conditions—Monroe County, like most rural counties, does not have the same tax base as more urbanized counterparts and does not have sufficient revenue streams to supply substantial amounts of financing for economic development projects on a regular basis. The economic data in Table 1 offers an explanation. At its peak the GOP employed almost 10,000 people, mostly women. The City of Aberdeen and Monroe County still have a larger percentage of female residents than the state or the U.S. The per capita income for Monroe County is \$18,598, lower than Mississippi (\$20,670) and the U.S. (\$28,051). In the GOP Target Area and in the City of Aberdeen, per capita income is even lower at \$14,933 and \$16,200, respectively. In the GOP Target Area, 18.6% of individuals live in poverty compared to 15.0% for the U.S. The poverty rate in Aberdeen is over 36% and in Monroe County it is 20.9%. Between 2011 and 2012 the civilian labor force in Monroe County shrank from 16,250 to 16,110, with the largest percentage of job losses in the administrative support sector (31%) that disproportionately affects women. In 2011, commuters into Monroe County for work numbered 2,271 while commuters that left Monroe County for work numbered 5,013.<sup>5</sup> In fact, residents are leaving Monroe County resulting in a -0.6% population change from 2011-2012 while the adjacent 5 Mississippi counties had population changes in that same time period ranging from -0.1% to +1.7%.<sup>6</sup> Recent closing or downsizing of area employers has contributed high unemployment, large number of commuters and declining population: Lane Furniture<sup>7</sup> (1,400 jobs), Hickory Hills Furniture Co.<sup>8</sup> (257 jobs), Omega Motion<sup>9</sup> (172 jobs), Sara Lee<sup>10</sup> (155 jobs), and Townhouse Home Furniture<sup>11</sup> (125 jobs). An EPA Site-Specific Hazardous Substances Assessment grant will allow Monroe County to address actual and perceived contamination at the former GOP site which will promote economic development on the GOP site and surrounding properties and address resident health concerns.

ii. Economic Effects of Brownfields— The loss of jobs in Monroe County has left this county with a bleaker economic picture than surrounding counties, the state or country. In 2011, the unemployment rate among all races in Monroe County was 13.0% while the unemployment rate for African-Americans was 23.8%.<sup>26</sup> This is particularly hard on communities like Aberdeen and the GOP Target Area which are 70.1% and 82.0% African-American, respectively, compared to 30.9% African-American for the county at large. The annual unemployment rate for 2012 was 11.4% for the county compared to 9.1% for the state and 8.1% for the country. In November 2013, Monroe County had the 9<sup>th</sup> highest unemployment rate out of Mississippi's 82 counties.<sup>27</sup> The most recent (Nov 2013) unemployment rates are 12.0%<sup>18</sup> for Monroe County and 8.3% for the state. Until the former GOP Target Area can be assessed and made ready for redevelopment, the County will be unable to attract new jobs to this industrial area that will increase tax revenues to make improvements to public amenities and services and put people back to work. Table 1 provides the economic data for the GOP Target Area in relation to the City of Aberdeen, Monroe County, state, and country. Health and environmental impacts also cause economic distress for the community since the burden of health care for the uninsured is born by the community. The following economic impacts to Monroe County, including the 5 sensitive populations, African-Americans, children <5 yrs old, seniors > 65 years old, low-income individuals, and women, have been identified due to the presence of brownfield properties (references are in tables and bullets above):

- |   |  |
|---|--|
| ⊗ Population decline                          | ⊗ Higher childhood leukemia mortality rate among African-American males                |
| ⊗ Closing/downsizing of employers             | ⊗ Fewer people with health insurance   |
| ⊗ Loss of jobs                                | ⊗ Fewer healthcare providers   |
| ⊗ More children and seniors living in poverty | ⊗ Poorer water quality from environmental releases                                     |
| ⊗ Lower per capita income                     | ⊗ Poorer air quality from environmental releases and ozone depleting chemicals         |
| ⊗ Fewer people completing high school         | ⊗ Higher noncancer health risks  |
| ⊗ Fewer homeowners                            | ⊗ Increased exposure, especially for sensitive populations, to developmental toxicants |
| ⊗ Longer commute for workers                  | ⊗ Increased exposure to production-related waste                                       |
| ⊗ Higher unemployment rate                    | ⊗ Lower life expectancy  |
| ⊗ Higher respiratory hazard risk              |  |
| ⊗ Higher neurological hazard risk             |  |
| ⊗ More adults reporting poor health           |  |
| ⊗ More low-birth weight babies                |  |



- ⊗ More premature births
- ⊗ Higher infant mortality rate
- ⊗ Higher lung cancer death rate
- ⊗ Increased exposure for sensitive populations to cancer risks from nearby facilities
- ⊗ Increased exposure for sensitive populations to noncancer risks from nearby facilities
- ⊗ Increased exposure for sensitive populations to recognized carcinogens
- ⊗ Increased exposure for sensitive populations to reproductive toxicants
- ⊗ Reduced property values
- ⊗ Lowered tax revenues

This EPA Brownfields Assessment grant will assist Monroe County in the assessment of soil and groundwater conditions so that the former GOP site can be cleared for redevelopment and, if necessary, cleanup plans developed in order to return jobs, opportunity, health, and economic vitality to the county.

**2. Project Description and Feasibility of Success a. Project Description i)** The 307-ac Target Area that was formerly part of the GOP facility is now known as Prairie Industrial Park-North. The entire parcel is advertised for lease or sale on the Monroe County Chamber of Commerce (Chamber) website.<sup>28</sup> Key selling points include: only 50 minutes (min) from the Toyota Corolla plant at Blue Springs, MS and 25 min from the Golden Triangle Aerospace Industrial Park; centrally located between Tupelo, Columbus, Birmingham, AL, and Memphis, TN; 43,047 college students, 3 universities, and 4 community college campuses within an 80-mi radius; and located in the center of one of the largest skilled labor markets in the Southeastern U.S. with over 300,000 with a manufacturing background. The Chamber was created in part to facilitate cooperation between the public and private sectors in order to improve the economic welfare and to create a higher quality of life for residents of Monroe County and the surrounding areas. The Chamber serves as the county-wide economic development organization and the primary contact on all major economic development projects, and assists with industry expansions and startup of companies. Success of redevelopment of the Target Area will be achieved by working with the Chamber to ensure the short- and long-term goals of the local community are implemented. The Chamber will serve as a liaison between Monroe County, the City of Aberdeen and Three Rivers Planning and Development District (PDD) to successfully implement the local and regional goals outlined in the Comprehensive Economic Development Strategy<sup>29</sup> (CEDS). (Three Rivers PDD is the economic development district to which Monroe County belongs.) CEDS serves as an economic roadmap to diversify and strengthen the economy in Monroe County and other surrounding areas in northeast Mississippi. Owned jointly by Monroe County and the City of Aberdeen, the GOP Target Area contains environmental hazards that currently inhibit redevelopment of portions of the site. Redevelopment of this site in particular is key to the success of Prairie Industrial Park-North and economic progress in the region. Enabling focused, area-specific environmental assessment of the target site will encourage potential developers to avail themselves of other resources for clean-up and redevelopment such as the ad valorem tax waiver, inventory tax waiver,<sup>30</sup> and the Brownfields Income Tax Credit<sup>31</sup> implemented by the state of Mississippi to provide tax credits of up to \$150,000 for the cleanup of a brownfields sites. Cleanup and redevelopment of the site will invite new industries, creating new job opportunities like the ones that once prevailed in this exact location when the GOP was in operation. Used as a guide for redevelopment, the CEDS provides a plan for implementing a strategy that uses the 6 Livability Principles from Partnership for Sustainable Communities developed jointly by EPA, U.S. Department of Housing and Urban Development (HUD), and U.S. Department of Transportation (USDOT) to defend against economic dislocations that have resulted in the loss of jobs and private investment in Monroe County.

**Livability Principle #1: Provide more transportation choices**

***CEDS Goal #1—Develop and Enhance Regional Infrastructure to Increase Economic Competitiveness—***

Key objectives include improving utility and transportation infrastructure for community and economic development; and promoting and further developing multimodal transportation networks. ***CEDS Goal #3—Strengthen the capacity of the region to compete in the global economy—***A key objective is improving public transit opportunities.

**Livability Principle #2: Promote equitable affordable housing**

***CEDS Goal #3—***A key objective is improving the availability and affordability of regional housing.

**Livability Principle #3: Enhance economic competitiveness**

***CEDS Goal #1—***A key objective is identifying, securing, and improving properties for economic utilization. ***CEDS Goal #2—Increase regional job opportunities and income—***Key objectives include



diversifying the economic base by targeting new businesses and emerging sectors; increasing the domestic and global competitiveness of the existing economic base; enhancing regional entrepreneurial activity and small business development; fostering and developing the utilization of innovative technologies; promoting sustainable uses of natural resources; and enhancing regional marketing tools and resources.

**Livability Principle #4: Support existing communities**

**CEDS Goal #1**—Key objectives include increasing access and utilization of telecommunications technology; and preserving and enhancing environmental assets through revitalization, reclamation and promotion of environmental stewardship.

**Livability Principle #5: Coordinate and leverage federal policies and investment**

**CEDS Goal #3**—A key objective is promoting regional collaboration involving the public and private sectors and community leadership development.

**Livability Principle #6: Value communities and neighborhoods**

**CEDS Goal #1**—A key objective is identifying and implementing planning and technical assistance initiatives for existing and future infrastructure systems. **CEDS Goal #2**—Key objectives include promoting investment in sustainable energy and other “green” project; and identifying and implementing planning and technical assistance initiatives to strengthen regional job growth and capital investment opportunities. **CEDS Goal #3**—Key objectives include enhancing workforce skills through training and education; increase educational attainment and achievement; increase access to quality early childhood education and K-12 education; increasing the availability of affordable high-quality health care; enhancing cultural and recreational opportunities; and identifying and implementing planning and technical assistance initiatives to strengthen regional competitiveness.

ii. Monroe County will have a contractor under contract within 4 months of being notified of the award. Since the County owns the site jointly with the City of Aberdeen, property access will not be an issue. (A letter of support from the City of Aberdeen is in Attachment iv.) A Quality Assurance Project Plan (QAPP) and Community Involvement Plan (CIP) will be submitted to EPA within two months of the beginning of the Cooperative Agreement (CA). Community meetings will be held twice a year at the Prairie Community Center, located adjacent to the Target Area. The County plans on dividing the 307-ac site into manageable areas for site assessment, much as it was divided for the SI completed by the USACE.<sup>14</sup> While completing the Phase I and II ESAs in some areas, the County will be conducting ground penetrating radar (GPR) surveys in areas where there is suspected buried material. ESAs, and cleanup planning will be occurring simultaneously at various locations within the site to facilitate: 1) opening up cleared areas for business as quickly as possible and 2) completing the grant before the deadline. Monroe County will achieve sufficient progress by having 35% of funding drawn down and obligated within the benchmark 18 months from the date of award of the project.

iii. Existing Conditions—The 307-ac Target Area lies ¼ mi from the Kansas City Southern rail line; 10 mi from the Aberdeen Port on the Tennessee Tombigbee Waterway; 30 mi from the Golden Triangle Regional Airport; and only 35 mi from Tupelo, MS<sup>30</sup> making it potentially attractive for industrial development. Located on the Black Prairie physiographic region of Monroe County, the eastern ~207 ac of site has been overgrown with brush and trees since the plant closure. Large mounds, now covered with vegetation, indicate likely buried debris on this normally flat terrain. Amid the overgrowth, the remains of several dilapidated buildings can be found. Cattle from the adjacent Mississippi State University Experimental Cattle Ranch sometimes graze here. The western ~100 ac of the site has numerous warehouse structures some of which are leased for storage and small commercial operations. Included in the bounds of the 307-ac Target Area, was the GOP “metals plant,” the possible burial of 100-lb practice bombs, and a 100-lb bomb manufacturing line.<sup>14</sup> The “metals plant” also known as Prairie Metals & Chemical Co (EPA ID MSD980839898) was proposed for NPL status in 1984. After a removal action, a site inspection resulted in the site being classified as NFRAP on March 31, 1986 because it didn't qualify for the NPL.<sup>15</sup> Additionally there are numerous former bunkers located on the site. According to a 2007 SI Report completed for the USACE, Mobile District for the entire former GOP,<sup>14</sup> recommendations for areas within the County's 307-ac Target Area include: a RI/FS with additional sampling for explosives in the 100-lb bomb line area because pieces of TNT and nitrocellulose or nitroglycerin were found during a site visit for a 1991 PA; a geophysical survey in the area where 100-lb bombs are possibly buried, and an RI/FS near the former

Storage/Machine Shop area because the explosive PETN was identified in surface soil as well as the metals antimony, copper, lead and zinc. Situated within a 1-mi buffer of the former GOP are several sites reporting to EPA which include 1 AFS site, 3 TRI sites, 3 RCRA generators, and 1 PCS site.<sup>16</sup> These sites include a resin compounding facility, a boat building facility, 2 vehicle parts manufacturing facilities and a wastewater treatment facility. Adjacent to the County's 307-ac Target Area, there was also a former manufacturer of a pesticide for red ants. There are 2 schools and 2 churches<sup>16</sup> within the 1-mi buffer of the site where sensitive populations could potentially be exposed to contamination. In addition to the potential health concerns from blowing dust and potential impacts to groundwater, Monroe County is concerned about the liability it has inherited with this facility due to the presence of the buried ordnance and surface contamination. The former GOP site is also a detriment to the development of Prairie Industrial Park-North, but also Prairie Industrial Park-South, across State Highway 382 from the site.

**b. Task Description and Budget Table**—Monroe County will divide the funds for hazardous substances assessment into 5 tasks: 1) Area-Wide Planning, 2) Quality Assurance (QA) Planning and ESA, 3) Cleanup Planning, 4) Community Outreach, and 5) Programmatic Implementation. Table 5 provides the Hazardous Substance Assessment budget. Monroe Board of Supervisors will manage the grant funds.

**Table 5: Hazardous Substance Assessment Budget**

Budget Categories	Project Tasks					
	1	2	3	4	5	Total
Personnel	\$9,000	\$9,000	\$9,000	\$9,000	\$9,000	\$45,000
Fringe Benefits						In-Kind
Travel					\$4,000	\$4,000
Equipment						In-Kind
Supplies						In-Kind
Contractual	\$5,000	\$251,000	\$25,000	\$10,000	\$8,000	\$299,000
Other: State Program Enrollment/Fees			\$2,000			\$2,000
Total	\$14,000	\$260,000	\$36,000	\$19,000	\$21,000	\$350,000

Personnel expenditures total \$45,000 for budget. This amount was derived from the expectation that implementing the Hazardous Substances Assessment CA Work Plan over a 3-year period will take approximately 1/3 of 1 staff person's time. Monroe County will keep timesheets to account for personnel expenditures. Employee fringe benefits such as health care, vacation, and training are included as "in-kind" on the budget tables and will be covered 100% by the County at an estimated cost of \$5,000/year of the grant. Travel costs will be incurred in attending EPA National and Regional Conferences and Workshops.

**Task 1. Area-Wide Planning--\$14,000**--The Brownfields Project Director will coordinate with Three Rivers PDD to identify potential future uses for various areas of the GOP Target Area. The potential future uses will be based on the results from ongoing community meetings and the CEDS<sup>29</sup> prepared by Three Rivers PDD. This information will be used to determine priority area for developing cleanup plans based on the future use and contaminants identified. The Brownfields Project Director will act as the liaison between interested developers and Three Rivers PDD to see that properties are suitable for the desired future use. The County will also coordinate with Three Rivers PDD to coordinate potential incentives available to new or expanding businesses in the GOP Target Area. The costs for implementing this task are as follows:

**Area-Wide Planning:**

1 Lump Sum (LS)@\$14,000

**Task 2. QAPP Preparation and ESAs—\$260,000**--Monroe County will select a qualified consultant to implement the grant agreement per the requirements of 40 CFR 31.36. The funds expended for this task will be used to subdivide and prioritize areas of the GOP site, prepare a generic Data Quality Objectives and Quality Assurance Project Plans (QAPP), conduct Phase I ESAs per EPA's All Appropriate Inquiry (AAI) requirements and ASTM E 1527-latest revision, prepare Site-Specific Addendums to the generic QAPP for subdivided areas, and conduct Phase II ESAs. Phase II ESAs will include use of GPR to investigate suspected buried materials. The costs for implementing this task are as follows (assumes 307-ac site is subdivided into 5 areas):

**QAPP Preparation and Phase I ESA--\$44,000:**  
Oversight--1 LS@\$9,000

Subdivision/Prioritization of Target Area—1  
LS@\$5,000

Generic QAPP—1 LS@\$5,000  
Phase I ESAs—5 areas @\$5,000<sup>32</sup>

**Phase II ESA--\$216,000:**  
**Site-Specific Addenda to the Generic QAPP--\$7,500**

5 areas @\$1,500

**Field Work--\$120,000:**

Clearing brush—40 ac @\$450<sup>33</sup>/ac  
GPR Survey—15 days@2,000<sup>34</sup>/day  
Driller--\$44,000<sup>33</sup> (5 wells @150 ft deep, 20 soil borings @ 25 ft/deep)  
Labor--\$28,000 (280 hr@ \$100/hr)

**Laboratory-- \$61,000<sup>35</sup>**

50 surface soil samples analyzed for volatile organic compounds (VOCs) by SW 8260B, semi-VOCs (SVOCs) and farm chemicals by SW 8270D, organo-pesticides by SW

8081A/8081B, and RCRA metals by SW 6010B/6010C/7470A

5 surface soil samples analyzed for explosives by SW 8095 or 8330B

50 subsurface soil samples analyzed for VOCs, SVOCs, farm chemicals, organo-pesticides, RCRA metals

5 subsurface soil samples analyzed for explosives

5 groundwater samples analyzed for VOCs, SVOCs, farm chemicals, organo-pesticides, RCRA metals

1 groundwater sample analyzed for explosives by SW 8330A

**Report Preparation-- \$27,500**

Labor-183.33 hr@ 150/hr

**Task 3. Cleanup Planning--\$36,000--**This task includes working with the EPA Region 4, MDEQ and the Monroe County Health Department to develop cleanup alternatives and associated cost estimates, and developing reuse plans for the areas affected by contamination, such that cleanup standards are appropriate and protective for the future intended use. The County will prepare an Analysis of Brownfields Cleanup Alternatives (ABCA) for sites with the potential to be enrolled in Mississippi's Voluntary Cleanup Program (VCP). The ABCA will be used to document that the appropriate type of cleanup is selected to address the environmental contamination issues and the cost effectiveness of alternatives. This task includes enrollment fees associated with enrollment in the VCP.

**Cleanup Planning:**

Oversight—1 LS@\$9,000

Enrollment Fee—2 areas @\$2,000

ABCA/Cleanup Plans—2 areas @\$12,500

**Task 4. Community Engagement--\$19,000--**Monroe County will rely on the existing strong partnerships with local organizations for community engagement. For this task the Brownfields Project Director will closely coordinate with our partner Community-Based Organizations (CBOs) to develop a Community Involvement Plan (CIP) that will meet the needs of partners and the community at large. The County anticipates engaging the community in all aspects of the implementation of the grant including site subdivision and prioritization, cleanup alternatives, and redevelopment planning. As part of the CIP, the County anticipates development of informative written materials, planning for 2 community meetings each year of the grant, attendance and/or presentation at neighborhood meetings, and other events which may include things such as an ice cream social and bus tour of the brownfields GOP Target Area. The costs for implementing this task are as follows:

**Community Engagement:**

Planning/Implementation of CIP--6 @\$4,000

Materials/Presentations by Consultant—6 @\$2,500.

**Task 5. Program Implementation-\$21,000-**This task includes programmatic implementation activities requiring the Brownfields Project Director's time for contractor oversight, review of reports, and providing monthly status, quarterly, and closeout reports. This task includes completion of Property Profile information as properties being assessed are entered into the Assessment, Cleanup and Redevelopment Exchange System (ACRES) database. Expenses for travel to the national EPA Brownfields conference are also included in this task. Some labor costs, including fringe benefits, incurred by Monroe County will be in-kind to maximize funding available for assessment efforts. The costs for implementing this task are as follows:

**Program Implementation:**

Report Review/Oversight--1 LS@\$9,000

Travel to EPA Conferences—1 @\$4,000

Qtrly and Final Reports/ACRES updates—13 @\$615.

**c. Ability to Leverage**--With the funding in Table 6, the Monroe County has been able to accomplish the following economic development/redevelopment projects in the last 5 yrs:

- ✓ Constructed building for Monroe County Health Department in Aberdeen
- ✓ Assisted with relocation of Townhouse Furniture that sustained damage during the April 2011 storms, creating 80 jobs
- ✓ Refurbished an industrial facility for lease to Homestretch, LLC, a furniture upholstery company, to the county, creating 139 new jobs
- ✓ Traffic infrastructure improvements to Homestretch LLC to include truck access, trailer parking and security fencing.
- ✓ Attracted Holley Performance Products, an auto customizing business, to Aberdeen creating 55 new jobs
- ✓ Building and roof improvements for United Furniture Industries, Inc.
- ✓ Rebuilt Smithville school gymnasium and added storm shelter/safe room
- ✓ Safe room added at Access Medical Center
- ✓ Addition of 11 outdoor warning sirens at Monroe County Volunteer Fire Dept
- ✓ Hired a Solid Waste Enforcement Officer
- ✓ Removed accumulated storm debris from Tombigbee Watershed

**Table 6: Funding Leveraged**

Source	Program	2013	2012	2011	2010	2009
Appalachian Regional Commission (ARC)	ARC	\$300,000				
Mississippi Development Authority (MDA)	Community Development Block Grant (CDBG)		\$1,323,363			
Mississippi Emergency Management Agency (MEMA)	Hazard Mitigation		\$73,125			
MDEQ	Solid Waste	\$19,296	\$16,660			
U.S. Dept. of Agriculture (USDA)	USDA-NRCS		\$128,562.50			
MDA	Development Infrastructure Grant Program (DIP)			\$265,800		
ARC	ARC			\$450,000		
ARC	ARC				\$240,000	
Homestretch, LLC	Private Investment				\$1,100,000	
MDA	DIP				\$298,300	
MDA	Capital Improvements Revolving Loan (CAP)				\$15,000,000	
HUD	CDBG-Economic Development (ED)					\$590,000
Holley Performance Products	Private Investment					\$1,328,300

Once assessment activities are completed redevelopment funding options can be considered including state legislative sources, MDA, HUD, or ARC since the County has leveraged these sources successfully

for other economic development projects. MDEQ has offered support and it may be possible to utilize the state's TBA program to complete site assessment work in the Target Area, should EPA Assessment Grant funds be insufficient to complete the work. (Documentation of 5 most recent leveraged resources is included as Attachment v.)

**3. Community Engagement and Partnerships: a. Plans for Involving Targeted Community & Other Stakeholders; and Communicating Project Progress**—Between now and the time of the grant awards, the County will solicit public comments on the EPA Brownfields Assessment Proposal. Monthly Public Service Announcements (PSAs) will be placed in The Monroe County Journal, which serves the entire county, including the City of Aberdeen. The PSAs will remind people to go to the County's website or Evans Memorial Library in Aberdeen to review this proposal. Comments on the proposal will be taken by Mr. Mike King, County Administrator. Comments received on the grant proposal will inform development of the CA Work Plan, should the County receive funding.

Monroe County will develop a CIP to be used at Board of Supervisors Meetings, Public Meetings, Neighborhood Meetings, and charrettes to invite citizen input and relay progress information. After the grant funds are awarded, community feedback will be solicited on health and safety concerns, cleanup planning, and the redevelopment. Public input will be a critical piece to determining the future use and other considerations that will affect the final redevelopment. Elements of the CIP for disseminating information and soliciting feedback will include:

- Brownfields page on the County's website
- PSAs placed in The Monroe County Journal (print and online), and aired on local radio;
- Meetings at the Prairie Community Center adjacent to the GOP Target Area.
- Flyers placed on homes and businesses within ¼ mi of the Target Area;
- Monthly progress updates posted on the County website and Evans Memorial Library with responses to questions and comments.
- Copies of project reports, Phase I and II ESAs, Cleanup Plans placed in Evans Memorial Library.
- Brownfields brochures available at various points around the community.

Monroe County will conduct semi-annual public meetings. The meetings will be held in early evening so the working public may attend. Childcare will be provided to encourage attendance of those with children. The meetings will be a forum for updating the community on progress and to solicit comments regarding progress and process. Questions and feedback will be documented and either answered during the meeting or in the next monthly media update. The County doesn't anticipate the need for interpreters since those in the Target Area are English-speakers.

**b. Partnerships with Government Agencies**, i, ii.—Monroe County already has established partnerships with the State of MS (MDEQ, MDOT, MDA, MS State Legislature, Mississippi Department of Employment Security (MDES)). Monroe County's agency partners for this project are:

- **City of Aberdeen, MS**—As joint owner with Monroe County of the GOP property, the City of Aberdeen will be assisting with community involvement and cleanup planning. A letter from the City in support of this project is in Attachment iv.  
information will allow MCHD to make prompt referral and notifications decisions, if necessary, for persons who believe they have been exposed to contamination. A letter of support from MCHD is in Attachment iv
- **MDEQ/Brownfields**: The County will coordinate with MDEQ Brownfields Program for cleanup planning. Areas of the site may be enrolled in the VCP so that when cleanup funding is made available they can progress toward a No Further Action determination from MDEQ.
- **MDES-Win Job Center**: MDES has a WIN Job Center in the City of Amory, Monroe County. The WIN Job Center provides job training and resources for job seekers as well as employer services. The WIN Job Center will post new job openings for employers locating in or near the
- **Monroe County Health Department--Aberdeen**: With a new facility in Aberdeen, the MCHD administers numerous programs and projects that aim to assist county residents that are in need of services. During this project, MCHD will be notified ahead of time of drilling, sampling, or other activities with the potential for exposure to contamination. The County will provide MCHD with Safety Data Sheets (SDS) in the Globally Harmonized System (GHS) format for contaminants identified during ESAs. This

Target Area. The Job Center will also provide on-the-job-training assistance for qualified employers who can't find qualified employees.

- **MDA:** MDA will assist the County with promoting properties for redevelopment by

adding GOP sites that are cleared and determined to be ready for development to its sites list and putting developers in touch with the County and Three Rivers PDD for development opportunities.

**c. Partnerships with Community Organizations--** To ensure appropriate and sustainable reuse of brownfields, Monroe County has garnered support from Community Organization partners at all levels including non-profits, neighborhood organizations, local business and economic development groups. Under this grant, the county will create a Brownfields Steering Committee with members from the Target Area as well from the community at large. The partnership will serve as a resource for the county and support this Brownfields Assessment Project. CBOs, key personnel, roles, and their commitments are in Table 7 below. Letters of support from CBOs are in Attachment iv.

**Table 7: Key Community-Based Organizations**

Organization	Key Personnel/Contact Information	Role/Commitment
Monroe County Chamber of Commerce	Howard Boozer/(662) 256-7194	Host a public meeting
Prairie Rural Community Development Club	James P. Chandler/(662) 369-8528	Community outreach
Prairie Greater St. Mark Outreach Ministry	Frank Bates/(662) 319-9060	Host a public meeting
Prairie Baptist Church	Wilbur T Putnam/(662) 369-5829	Community outreach
Professional Land Services	Eric M Jonas/(662) 436-6360	Support

**4. Project Benefits** **a. Health and/or Welfare and Environment—**Environmental, health concerns in the Target Area are tied to the risk associated with potential contamination of soil and groundwater from the brownfield site. The benefits to the Target Area are:

**Environmental:**

- ☺ Better water quality
- ☺ Better air quality

**Public Health:**

- ☺ Lower respiratory hazard risk
- ☺ Lower neurological hazard risk
- ☺ Fewer adults reporting poor health
- ☺ Fewer low-birth weight babies
- ☺ Lower childhood leukemia mortality rate among African-American males
- ☺ More people with health insurance
- ☺ More healthcare providers
- ☺ Lower noncancer health risks
- ☺ Decreased exposure, especially for sensitive populations, to developmental toxicants

- ☺ Decreased exposure to production-related waste
- ☺ Higher life expectancy
- ☺ Fewer premature births
- ☺ Lower infant mortality rate
- ☺ Lower lung cancer death rate
- ☺ Decreased exposure for sensitive populations to cancer risks from nearby facilities
- ☺ Decreased exposure for sensitive populations to noncancer risks from nearby facilities
- ☺ Decreased exposure for sensitive populations to recognized carcinogens
- ☺ Decreased exposure for sensitive populations to reproductive toxicants

Precautions will be taken during ESAs to reduce the risk of exposure or physical hazard to the public and control site runoff. Fencing will be used to restrict access to contaminated areas and unsafe dilapidated buildings. Contaminated waste drums generated during site investigation will be properly labeled and secured inside fencing. Dust suppression methods will be used to reduce air-borne contamination. Elements on the site that could provide an attractive nuisance to children such as empty containers or holes in fencing will be removed or secured. If immediate threats to the public health are encountered, the County will immediately notify MDEQ, EPA, and MCHD. Monroe County will also take steps to minimize public exposure such as notifying impacted public utilities. When longer term action is needed, Monroe County will work to put in place institutional controls to protect the public from exposure.

**b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse,** i. Three Rivers PDD, including Monroe County, has expressed its commitment to sustainable reuse in some of the CEDs objectives.<sup>29</sup>

**Infrastructure Reuse/Sustainable Reuse: CEDS Goal #1—Develop and Enhance Regional Infrastructure to Increase Economic Competitiveness** Key objectives include preserving and enhancing environmental assets through revitalization, reclamation, and promotion of environmental stewardship; and identifying and implementing planning and technical assistance initiatives for existing and future infrastructure systems. **CEDS Goal #2—Increase Regional Job Opportunities and Income** A key objective is promoting sustainable economic uses of natural resources.

**Renewable Energy: CEDS Goal #2—A** key objective is promoting investments in sustainable energy and other “green” projects.

**GOP Target Area—**The County is planning on recovering and recycling, if not contaminated with asbestos, bricks from the derelict on-site buildings. The bricks are of local historical interest since many county residents had parents or grandparents who worked at the GOP facility and the bricks are unique to that time period. Trees that are removed during the site clearing and grubbing in preparation for the GPR survey will be recovered and sold for firewood. The site has several wetlands areas which may be adapted for ex-situ treatment of groundwater for metals or explosives.<sup>36</sup>

ii. Due to the need for very large existing industrial buildings, 590 jobs are now located in the old Advantage/Lucky Star and PeopLounger buildings in the City Nettleton, Monroe County. Both of these buildings were vacant until Jan. 2010, and Apr. 2011, respectively. They are now occupied by Homestretch and United Furniture Industries. The existing buildings were remodeled for reuse with a mixture of private investment and funding from MDA and ARC. This project created over 590 new jobs for county residents demonstrating Livability Principles #s 3, 4, 5, and 6: enhancing economic competitiveness; supporting existing communities; coordinating and leveraging federal policies and investments; and valuing communities and neighborhoods.

**c. Economic Benefits,** i. Economic benefits from this brownfields redevelopment project include:

- **Stemming Population Decline—**A safe attractive Prairie Industrial Park with local jobs will create a county where people want to live and work.
- **Economic Development/Business Retention—**Derelict/abandoned buildings affect company decisions to relocate to an area. Properties determined to be free from environmental hazards, affordable housing, and recreational facilities will encourage economic development.
- **New Jobs/Return of Lost Jobs—**Attractive properties, ready for redevelopment will increase the number of jobs available to residents near the GOP Target Area.
- **Higher per Capita Income—**Bringing high-wage jobs to Monroe County will raise the County's below average per capita income.
- **Better Trained Workforce—**The county's partnership with the WIN Job Center will assist in training employees for new jobs and new job opportunities will attract trained workers and professionals.

- **Shorter Commute—**New jobs in Monroe County will reduce the expense of long commutes of many residents.
- **Increased Property values—**Reduction of contamination, blight, will improve surrounding property values and promote redevelopment of neighborhoods.
- **Increased Tax Revenues—**Increased property values will lead to increased property tax revenue while increased business opportunities will translate into increased sales tax revenue.
- **Fewer Medical Expenses—**Sites that are clean will provide an opportunity for jobs with health benefits and will reduce medical expenses currently born by hospitals and local government.
- **Reduced poverty—**With more job opportunities, affordable housing and training, fewer people will live in poverty, reducing the strain on local public assistance resources and adding to Monroe County's economic vitality.
- **Environmental Justice—**The impact of brownfields will no longer impinge upon those with the least economic power.

ii. Monroe County has partnered with the WIN Job Center in Amory to post new jobs and/or train job seekers. The county will also post jobs on the brownfields section of its website and provide contact



information for job training at the WIN Job Center office. No EPA Brownfields Job Training Grants have been awarded in Mississippi since 2006.

**5. Programmatic Capability and Past Performance a. Programmatic Capability**—Mr Mike King, Monroe County Supervisor, will be administering the Brownfields Assessment grant. Mr King will have assistance from Three Rivers PDD. Monroe County, with the assistance of Three Rivers PDD has managed numerous grants including grants from HUD, MDA, ARC, and USDA. In the event that Mr King is unable to complete his engagement as County Administrator, the new County Administrator will also have the assistance of Three Rivers PDD which will have been involved in the grant since it was awarded. Three Rivers PDD will work closely with Monroe County ensuring that grant compliance is met.

The selection of a qualified consultant to implement the grant agreement will be based on the procurement provisions of 40 CFR 31.36. It is the policy of Monroe County that Disadvantaged Business Enterprises (DBEs) have an equal opportunity to participate in the performance of contracts. Contractors must make good faith efforts in securing DBE contractors. A cost analysis will also be a weighted part of the selection process per Section IV.F. of the *FY14 Guidelines for Brownfields Assessment Grants*.

**b. Audit Findings**—Monroe County is audited annually pursuant to the regulations of the MS State Auditor and has not received any material audit findings from an OMB Circular A-133 audit or an audit conducted by federal, state, tribal, or local government inspector general, nor has it ever been required to comply with special "high risk" terms and conditions.

**c. Past Performance and Accomplishments**, ii. Monroe County has never received an EPA Brownfields grant, however the County has successfully managed a number of grants from various sources including ARC, MDA, MEMA, and USDA. In the last 5 years Monroe County has been awarded over \$2,000,000 in grants. Table 8 identifies 5 recent assistance agreements along with the results achieved.

**Table 8: Grant Management History**

Grantor	Grant Year	Type	Amount	Reporting on Time	Final Report Accepted	Results Achieved
ARC	2013	ARC	\$300,000	Yes	In Progress	Traffic infrastructure improvements for HomeStretch LLC
MDA	2012	Emergency CDBG	\$400,000	Yes	Yes	Addition of a safe room to Smithville School gymnasium
MEMA	2012	Hazard Mitigation	\$341,328	Yes	In Progress	11 outdoor warning sirens installed at Monroe County Volunteer Fire Dept
USDA	2012	NRCS	\$38,247.46	Yes	Yes	Removed storm-related debris from Weaver Creek
MEMA	2012	Hazard Mitigation	\$1,797,762	Yes	In Progress	Rebuild gymnasium and add storm shelter at Smithville school

<sup>1</sup> Monroe County Chamber of Commerce, "History of Monroe County," [www.gomonroe.org/monroehistory.php](http://www.gomonroe.org/monroehistory.php). 30 Dec 30 2013.

<sup>2</sup> And Speaking of Which..., <http://andspeakingofwhich.blogspot.com/2012/06/gulf-ordnance-plant.html>, Jan 3, 2014.

<sup>3</sup> Delta Archaeology, [http://www.deltaarchaeology.us/gulf\\_ordnance.htm](http://www.deltaarchaeology.us/gulf_ordnance.htm), Jan 3, 2014.

<sup>4</sup> City-Data.com, [http://www.city-data.com/county/Monroe\\_County-MS.html](http://www.city-data.com/county/Monroe_County-MS.html), Jan 3, 2014.

<sup>5</sup> Mississippi Department of Employment Security (MDES), *Labor Force and Establishment-Based Employment, Annual Averages 2011 Forward*.

<sup>6</sup> MDES, Data Maps, *Percent Population Change 2011-2012*.

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- <sup>7</sup> The Lee County Courier, "1,400 Lane layoffs to start in October," Sept 11, 2013.
- <sup>8</sup> MDES, Worker Adjustment and Retraining Notifications, First Quarter--Program Year 2008 (July 2008-September 2008).
- <sup>9</sup> Community Development Foundation, Tupelo and Lee County, Mississippi, Area Expansions and Closings. [http://www.cdfms.org/media/44792/company\\_expansions\\_and\\_closings.pdf](http://www.cdfms.org/media/44792/company_expansions_and_closings.pdf). Jan 2, 2014.
- <sup>10</sup> MDES, Worker Adjustment and Retraining Notifications, Third Quarter--Program Year 2011 (Jan-Mar 2012).
- <sup>11</sup> MDES, Worker Adjustment and Retraining Notifications, Fourth Quarter--Program Year 2010 (April 2011-June 2011).
- <sup>12</sup> NOAA's National Weather Service, NWSChat, <https://nwschat.weather.gov/p.php?pid=201104291359-KMEG-NOUS44-PNSMEG>, Jan 3, 2014.
- <sup>13</sup> The Daily Journal, "Smithville remembers April 27 tornado Saturday," Apr 26, 2013.
- <sup>14</sup> U.S. Army Corp of Engineers, Mobile District. "FINAL Site Inspection Report--Gulf Ordnance Plant Site, Prairie, Mississippi, FUDS Project #A04MS001206," September 2007.
- <sup>15</sup> USEPA Search Superfund Site Information, <http://cumulis.epa.gov/supercpad/cursites/cactinfo.cfm?id=0402478>, Jan 3, 2014.
- <sup>16</sup> EPA EJ Viewer, <http://epamap14.epa.gov/ejmap/ejmap.aspx?wherestr=Covington%2C%20Louisiana>, Dec 30, 2013.
- <sup>17</sup> U.S. Census Bureau, <http://factfinder2.census.gov>, Nov 4, 2013.
- <sup>18</sup> Economagic.com <http://www.economagic.com>, Nov 12, 2013.
- <sup>19</sup> Monroe County 2007 Health Profile, <http://msdh.ms.gov/county/Monroe.pdf>.
- <sup>20</sup> County Health Rankings. <http://www.countyhealthrankings.org>, Univ of Wisconsin. Dec 30, 2013.
- <sup>21</sup> Health Resources and Services Administration, U.S. Department of Health and Human Services, <http://datawarehouse.hrsa.gov/default.aspx>, Nov 11, 2013.
- <sup>22</sup> Scorecard.org. <http://www.scorecard.org>. Nov 11, 2013.
- <sup>23</sup> Community Health Status Indicators, <http://wwwn.cdc.gov/CommunityHealth/>, Nov 12, 2013.
- <sup>24</sup> Shineldecker, Chris L. Handbook of Environmental Contaminants. Lewis Publishers, Inc. Chelsea Michigan. 1992.
- <sup>25</sup> National Institute for Occupational Safety and Health. Pocket Guide to Chemical Hazards. US Government Printing Office. Washington, D.C. 2011. <http://www.cdc.gov/niosh/npg/>.
- <sup>26</sup> MDES, Labor Market Information for Affirmative Action Programs, Updated September 2012.
- <sup>27</sup> MDES, Labor Market Data, 2013, Monthly Unemployment Rates.
- <sup>28</sup> Monroe County Chamber of Commerce, Available Buildings and Sites, <http://www.gomonroe.org/details.php>, Jan 6, 2014.
- <sup>29</sup> Three Rivers Planning and Development District, Inc., Comprehensive Economic Development Strategy 2012-2017.
- <sup>30</sup> Monroe County Chamber of Commerce, Prairie Industrial Park-North site listing, Jan 6, 2014.
- <sup>31</sup> Mississippi Department of Environmental Quality, [http://www.deq.state.ms.us/MDEQ.nsf/page/GARD\\_brownfields?OpenDocument](http://www.deq.state.ms.us/MDEQ.nsf/page/GARD_brownfields?OpenDocument), Jan 6, 2014.
- <sup>32</sup> Assumes site is subdivided into 5 areas. Cost of Phase I ESAs are elevated due to complexity of site and extensive history of contamination.
- <sup>33</sup> Get-A-Quote.net, <http://www.get-a-quote.net/>, Jan 6, 2013.
- <sup>34</sup> EPA-Clu-In, <http://clu-in.org/characterization/technologies/gpr.cfm>. Jan 3, 2014.
- <sup>35</sup> TestAmerica, Inc, Cedar Falls Iowa--Price List for Stanley Consultants, Sept 2013.
- <sup>36</sup> FRTR Remediation Technologies Screening Matrix and Reference Guide, 4.42 Constructed Wetlands, <http://www.frtr.gov/matrix2/section4/4-43.html>, Jan 7, 2014.

## Attachment i) Threshold Documentation

## THRESHOLD CRITERIA FOR ASSESSMENT GRANT

1. **Applicant Eligibility** Monroe County, Mississippi (MS), created by state legislature in 1821, is unit of local government as defined under 40 CFR Part 31 and an eligible entity to receive EPA Brownfields Assessment funding.

2. **Letter from the State or Tribal Authority** Monroe County has received support from the Mississippi Department of Environmental Quality (MDEQ) for its brownfields initiative and received a letter of acknowledgement from the MDEQ Brownfields Program Manager, Trey Hess, acknowledging Monroe County's intent to conduct site-specific brownfields assessment activities (Attachment ii).

3. **Community Involvement** Between now and the time of the grant awards, the County will solicit public comments on the EPA Brownfields Assessment Proposal. Monthly Public Service Announcements (PSAs) will be placed in the Monroe County Journal, which serves the entire county, including the City of Aberdeen. The PSAs will remind people to go to the County's website or Evans Memorial Library in Aberdeen to review this proposal. Comments on the proposal will be taken by Mike King, County Administrator. Comments received on the grant proposal will inform development of the CA Work Plan, should the County receive funding.

Monroe County will develop a CIP to be used at Board of Supervisors Meetings, Public Meetings, Neighborhood Meetings, and charrettes to invite citizen input and relay progress information. After the grant funds are awarded, community feedback will be solicited on health and safety concerns, cleanup planning, and the redevelopment. Public input will be a critical piece to determining the future use and other considerations that will affect the final redevelopment. Elements of the CIP for disseminating information and soliciting feedback will include:

- Brownfields page on the County's website
- PSAs placed in The Monroe County Journal (print and online), and aired on local radio;
- Meetings at the Prairie Community Center adjacent to the GOP Target Area.
- Flyers placed on homes and businesses within ¼ mile of the Target Area;
- Monthly progress updates posted on the County website and Evans Memorial Library with responses to questions and comments.
- Copies of project reports, Phase I and II ESAs, Cleanup Plans placed in Evans Memorial Library.
- Brownfields brochures available at various points around the community.

Monroe County will conduct semi-annual public meetings. The meetings will be held in early evening so the working public may attend. Childcare will be provided to encourage attendance of those with children. The meetings will be a forum for updating the community on progress and to solicit comments regarding progress and process. Questions and feedback will be documented and either answered during the meeting or in the next monthly media update. The County doesn't anticipate the need for interpreters since those in the Target Area are English-speakers.

## 4. **Site Eligibility & Property Ownership Eligibility**

### **Site Eligibility:**

#### **a. Basic Site Information**

- (a) Name: Former Gulf Ordnance Plant (GOP)/Prairie Industrial Park-North
- (b) Address: 10015 Worldwide Drive, Aberdeen, MS 39730
- (c) Current Owner: City of Aberdeen and Monroe County

#### **b. Status and History of Contamination at the Site**

(a) Contamination: Hazardous Substances

(b) Operational History and Current Uses:- The site was part of a government-owned, contractor-operated World War II ammunition plant from 1942-1945. Activities at the plant included loading and assembly of small arms ammunition, manufacture of large projectiles, rockets, and bombs, and ordnance storage and demolition. In August 1945 all work on production lines was terminated and decontamination for shutdown at the GOP began. Prior to demilitarization of ammunition, explosives and other components began 6,931,698 items of ammunition and 804,309 pounds (lbs) of bulk explosives and propellants were stored on-site. Burn areas, trenches, and burial pits were associated with ordnance demolition. The plant was declared surplus on January 1, 1946. A Decontamination Certificate was issued for the facility in July of 1946. The site was declared a Formerly Used Defense Site (FUDS #A04MS001206). The Decontamination Certificate issued July 26, 1946 stated that the site was returned to standby condition, but further decontamination would be required. By August 28, 1946 all demilitarization, burning, and demolition operations at the plant were declared complete. In June 1946, 3,120 ac of the site were transferred to the State of Mississippi for establishment of a veteran's training school with the conditions prior to occupation that included a release of liability of the War Assets Administration and the exclusion of the South Burning Ground from transfer, since it could not be decontaminated. In 1948 a report stated that the State of Mississippi had not completed decontamination of some of the buildings prior to use. Portions of the site were transferred to the Prairie-Aberdeen Separate School District (approximately 19.4 ac), and Monroe County (approximately 20 ac in road easements). In 1953, the 3,120-ac parcel sold to the State of Mississippi was reacquired by the Air Force. Approximately 1,750 ac of this were leased to the Mississippi Experiment Station run by Mississippi State University. The Air Force portion of the site was used as the Prairie Vehicle Storage Station until the property was gradually declared excess by the General Services Administration (GSA) and disposed from 1962 through 1976 with Monroe County and the City of Aberdeen, MS jointly acquiring approximately 308 ac on Feb 11, 1964. The City of Aberdeen is currently using 1 acre of the site for materials storage. The 1-ac storage area is in the NW corner of the SE 1/4 of Section 2, Township 15-S, Range 6-E and is not included in the request for assessment funds, leaving 307 ac to be assessed.

(c) Environmental concerns: According to a 2007 Site Investigation (SI) Report completed for the U.S. Army Corps of Engineers (USACE), Mobile District for the entire former GOP site, recommendations for areas within the County's 307-ac parcel include: a Remedial Investigation(RI)/ Feasibility Study (FS) with additional sampling for explosives in the 100-lb bomb line area because pieces of trinitrotoluene (TNT) and nitrocellulose or nitroglycerin were found during a site visit for a 1991 Preliminary Assessment (PA); a geophysical survey in the area where 100-lb bombs are possibly buried, and an RI/FS near the former Storage/Machine Shop area because the explosive pentaerythritol tetranitrate (PETN) was identified in surface soil as well as the metals antimony, copper, lead and zinc.

(d) How the site became contaminated: Within the bounds of the 307-ac parcel, was the GOP "metals plant," the possible burial of 100-lb practice bombs, and a 100-lb bomb manufacturing line. The "metals plant" also known as Prairie Metals & Chemical Co (EPA ID MSD980839898) was proposed for National Priorities List (NPL) status in 1984. After a removal action, a site inspection resulted in the site being classified as No Further Remedial Action Planned (NFRAP) on March 31, 1986 because it didn't qualify for the NPL.

**c. Sites ineligible for funding**

(a) The site is not listed or proposed for listing on the National Priorities List;

(b) The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA;

(c) The site is not subject to the jurisdiction, custody or control of the U.S. government.

**d. Sites requiring a Property-Specific Determination**

Not applicable

**Property Ownership Eligibility:**

**e. CERCLA §107 Liability** Neither Monroe County nor the City of Aberdeen are liable for contamination at the site under CERCLA §107 since the site is a formerly used defense site (FUDS) and all disposal of hazardous substances at the site occurred before GSA transferred the site to Monroe County and the City of Aberdeen.

**f. Enforcement or Other Actions** Neither Monroe County nor the City of Aberdeen are aware of any environmental enforcement actions related to the site.

**g. Information on Liability and Defenses/Protections Where Applicant Does NOT Own the Site**

Not applicable

**h. Information on Liability and Defenses/Protections Where Applicant Owns the Site or Will Own the Site During the Performance of the Grant**

i) Information on property acquisition

1) In August 1945 all work on production lines at the Gulf Ordnance Plant was terminated and decontamination for shutdown began. The plant was declared surplus on January 1, 1946. The site was declared a Formerly Used Defense Site (FUDS #A04MS001206). The Decontamination Certificate issued July 26, 1946 stated that the site was returned to standby condition, but further decontamination would be required. By August 28, 1946 all demilitarization, burning, and demolition operations at the plant were declared complete. In June 1946, 3,120 ac of the site were transferred to the State of Mississippi for establishment of a veteran's training school with the conditions prior to occupation that included a release of liability of the War Assets Administration and the exclusion of the South Burning Ground from transfer, since it could not be decontaminated. In 1948 a report stated that the State of Mississippi had not completed decontamination of some of the buildings prior to use. Portions of the site were transferred to the Prairie-Aberdeen Separate School District (approximately 19.4 ac), and Monroe County (approximately 20 ac in road easements). In 1953, the 3,120-ac parcel sold to the State of Mississippi was reacquired by the Air Force. Approximately 1,750 ac of this were leased to the Mississippi Experiment Station run by Mississippi State University. The Air Force portion of the site was used as the Prairie Vehicle Storage Station until the property was gradually declared excess by the GSA and disposed from 1962 through 1976 with Monroe County and the City of Aberdeen, MS jointly acquiring approximately 308 ac on Feb 11, 1964. The City of Aberdeen is currently using 1 acre of the site for materials storage. The 1-ac storage area is in the NW corner of the SE 1/4 of Section 2, Township 15-S, Range 6-E and is not included in the request for assessment funds, leaving 307 ac to be assessed.

2) The property was gradually declared excess and disposed from 1962 through 1976 with Monroe County and the City of Aberdeen, MS jointly acquiring approximately 308 ac.

3) U.S. General Services Administration

4) None

ii) Timing and/or Contribution Toward Hazardous Substance Disposal All hazardous substances at the site were placed there prior to Monroe County and the City of Aberdeen acquiring the site. Neither Monroe County nor the City of Aberdeen caused or contributed to any release of hazardous substances at the site. Nor has Monroe County or the City of Aberdeen at any time arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

iii) Pre-Purchase Inquiry

- 1) No pre-purchase inquiry was conducted since the property transfer took place in the 1964.
- 2) Not applicable.
- 3) Not applicable.

iv) Post-Acquisition Uses The eastern ~207 ac of site has been overgrown with brush and trees since the plant closure. Cattle from the adjacent Mississippi State University Experimental Cattle Ranch sometimes graze here. The western ~100 ac of the site has numerous warehouse structures some of which are leased for storage and small commercial operations such as storage and a furniture store. Neither Monroe County nor the City of Aberdeen have used the 307-ac site since it was acquired.

iv) Continuing Obligations

Monroe County and the City of Aberdeen have taken reasonable steps to 1) stop any continuing releases; 2) prevent any threatened future releases; and 3) prevent or limit exposure to previously released hazardous substances by limiting access to the site with fencing.

Monroe County and the City of Aberdeen commit to 1) complying with all land-use restrictions and institutional controls; 2) assisting and cooperating with those performing the assessment and providing access to the property; 3) complying with all information requests and administrative subpoenas that have or may be issued in connection with the property; and 4) providing all legally required notices.



## Attachment ii) Letter from the State Environmental Authority



STATE OF MISSISSIPPI  
PHIL BRYANT  
GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
TRUDY D. FISHER, EXECUTIVE DIRECTOR

December 17, 2013

Mr. Mike King  
County Administrator  
Monroe County  
PO Box 578  
Aberdeen, MS 39730

RE: EPA Brownfield Grant Application Acknowledgement  
Monroe County

Dear Mr. King:

The Mississippi Department of Environmental Quality (MDEQ) hereby acknowledges the County's plans to conduct brownfield activities and plans to apply for federal grant funds through the United States Environmental Protection Agency's (EPA) Brownfields initiative. Since many brownfields are abandoned, underutilized, and contaminated, MDEQ is expressly interested in seeing entities like the County take the initiative to assess, remediate, and return these sites to productive use. These efforts are consistent with our mission to safeguard the health, safety, and welfare of present and future generations of Mississippians. We look forward to our continued role in the County's Brownfield Initiative and are available to assist you at any time. Should you have any questions or comments concerning this matter, please contact me at (601) 961-5654.

Sincerely,

A handwritten signature in black ink, appearing to read "Jere Hess".

Jere "Trey" Hess  
Brownfield Program Coordinator

Attachment iv) Letters of Support from  
Community-Based Organizations



**MONROE COUNTY**  
**CHAMBER OF COMMERCE**

January 14, 2014

**ABERDEEN OFFICE**

124 WEST COMMERCE

ABERDEEN, MS

39730

Billy Kirkpatrick  
Board President  
Monroe County Board of Supervisors  
P.O. Box 578  
Aberdeen, MS 39730

Dear Mr. Kirkpatrick:

662/369-6488

662/369-6489 fax

The Monroe County Chamber of Commerce is in full support of Monroe County seeking funding that may help spur economic development by assessing perceived contaminated sites.

We are committed to protect the health, safety and wellbeing of all present and future generations of Monroe County.

**AMORY OFFICE**

The Monroe County Chamber of Commerce would be willing to assist in the process by hosting a public meeting to gather public input on the project.

1619 HWY. 25 NORTH

AMORY, MS

38821

With the EPA Brownfield Grant, we can continue our fight for non-contaminated water, soil and air in our county.

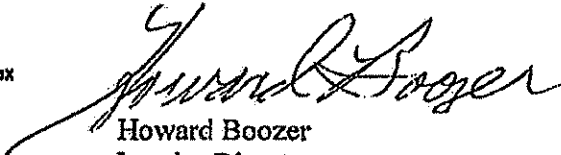
We are striving, with your help, to make Monroe County a safe and thriving place for all of our residents.

Thank you for your consideration.

Sincerely,

662/256-7194

662/256-9671 fax

  
Howard Boozer  
Interim Director

e-mail:

chamber@gomonroe.org



*PRAIRIE RURAL COMMUNITY DEVELOPMENT CLUB*



*James P. Chandler, President  
10238 Homestead Road  
Aberdeen, Mississippi 39730*

*January 14, 2014*

*Mr. Billy Kirkpatrick, President  
Mr. Michael King, County Administrator  
Monroe County Board of Supervisors  
Post Office Box 578  
Aberdeen, MS 39730*

*Dear Mr. Kirkpatrick and Board Members:*

*This letter is given in support of Monroe County Board of Supervisors application for an assessment grant from the Environmental Protection Agency - Branfield Program.*

*The tract of land to be assessed is the Prairie ammunition plant that was closed by the US government more than 50 (fifty years) past. Through this grant, Monroe County could clarify the content of the ground and identify best possible uses for this area.*

*Please be assured of the Prairie Rural Community Development Club (RCDC) support of Monroe County's assessment proposal which could serve as a catalyst for the economic, industrial, and social development of our community.*

*Yours Truly,*

*James P. Chandler  
President, Prairie RCDC*

*cc: Supervisor Fulton Ware*

Prairie, Mississippi

January 10, 2014

To Whom It May Concern:

The Prairie New Greater Saint Mark Outreach Ministry is in full support of the Brownfield Assessment for the Gulf Ordinance Park.

We have been under the cloud of uncertainty for this area for many years. We need to have development of our area and this is impossible unless we know the status of this area as far as contamination is concerned. This uncertainty has been a blight on economic advancement in our area and it is time to find out the facts. With the EPA Brownfield Grant, we can fight for non-contamination of our water and our air.

We are urging that this grant be approved so that we can seek economic development and a better life for our community.

Thank you for your serious consideration in assisting us.

We will also be happy to host a public meeting. *Prather Bates*

Sincerely,

1. Frank Bates  
2. Charles Bates  
3. David Day  
4. Virginia Day  
5. Frank Day  
6. Gene Jack  
7. Davis Jack  
8. Ruth Landin  
9. Susan Loretters  
10. Lanny Carothers  
11. Brandy Walker  
12. Travis Walker

13. Madelyn Walker  
14. Ka'Darius Walker  
15. Ray Carter  
16. Mary McMillian  
17. Carol Hensley  
18. Ollie Day  
19. Bobbie Brown  
20. Roy McMillian  
21. Doris Carothers  
22. Annie Lee  
23. Gertrude McMillian  
24. Reva W. Hester  
25. Trivette Tallie  
26. Tia Buck  
27. Lamonté Carter  
28. Ray Carter  
29. Ray Carter  
30. Tasha Clark  
31. Rachel Carter  
32. Eric McMillian  
33. Dany Carothers  
34. Tia Buck  
35. Tia Buck  
36. Robert Lee  
37. William Rogers  
38. William Rogers  
39. William Rogers  
40. William Rogers

11. Jack Skelley	74.
12. Albert Luy	75.
13. Annie Luy	76.
14. Walter Luy	77.
15. Donna Franke	78.
16. Nicole Franke	79.
17. Tony McMillian	80.
18. EMMA Watkins	81.
19. Anne Watkins	82.
20. Salami Dotter	83.
1. Kristen Metcalfe	84.
2	85.
3	86.
4	87.
5	88.
6	89.
7	90.
8	91.
9	92.
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17	100.
18	101.
19	102.
20	103.
21	104.
22	105.
23	106.



Prairie, Mississippi

January 10, 2014

To Whom It May Concern:

The Prairie Baptist Church is in full support of the Brownfield Assessment for the Gulf Ordnance Park.

We have been under the cloud of uncertainty for this area for many years. We need to have development of our area and this is impossible unless we know the status of this area as far as contamination is concerned. This uncertainty has been a blight on economic advancement in our area and it is time to find out the facts. With the EPA Brownfield Grant, we can fight for non-contamination of our water and our air.

We are urging that this grant be approved so that we can seek economic development and a better life for our community.

Thank you for your serious consideration in assisting us.

Sincerely,

Willie T. Tulum  
Barbara Wilson  
Terone Shannon  
Allen Sparks  
Jennell Sparks  
Dandy Dye  
Garnie Rashon  
Michael Red  
Beverly Red  
Annette Jackson  
Erin Dutton

Haroldine Smith  
Emmel Jackson  
Courtney Lockie  
Charlotte Lockie  
Charlene McGarrh  
Nease Callous  
Michael Collins  
Claude East  
Judy Easter  
Charlene McGarrh

Sara Hulbert  
Nathaniel Winter

Melina Cantrell

Everett Cantrell

Gracie West

Bailey Snider

Jim Snider

Jay Cantrell

Holly Cantrell

Cherion Boone

**Eric M. Jonas**

Professional Land Services

P. O. Box 1  
Prairie, MS 39756  
ericjonas@att.net  
(662) 436-6360

January 14, 2014

To Whom it May Concern:

As a resident of Prairie, I am I full support of the Brownfield Assessment for the Prairie Industrial Park.

The State of Mississippi, County of Monroe and City of Aberdeen have about 2700 acres that is a part of the former Gulf Ordnance Plant. Since 1960 part of the area has been operated as an industrial park and 2400 acres are retained by Mississippi State University as an agricultural experiment station.

In the past there has been talk of landing a large scale industry but our area seems to miss out on landing such facilities. Areas to the North and South of us acquire land and create industrial areas while we have this large amount of land that is already owned by the public domain that is basically unused.

This industrial park is part of the former Gulf Ordnance Plant. Most of the buildings have been removed through a DERP (Defense Environmental Restoration Program) clean up in the 1990's. Even though there have been some clean up programs it would be good if the Brownfield Grant would be approved and help clear up any uncertainty as far as environmental issues are concerned and hopefully jump start some industrial development and bring much needed jobs to our industrial park.

I urge that this grant be approved so we can improve the employment opportunities to our community.

Sincerely yours,



Eric M. Jonas



State of Mississippi  
Monroe County  
Department of Human Service  
Contina Moore, Director

January 14, 2014

Monroe County Board of Supervisors  
P.O. Box 587  
Aberdeen, MS 39730

Dear Monroe County Board of Supervisors:

The Monroe County Department of Human Services is in full support of Monroe County seeking funding that may help promote economic development by assessing perceived contaminated sites.

The Monroe County Department of Human Services main mission is to provide services for people in need by optimizing all available resources to sustain the family unit and promote self-sufficiency throughout Monroe County. We want to also ensure the health, safety, and well-being of all present and future generations of our Monroe County residents.

With the EPA Brownfield Grant, we can continue our fight to ensure that there are no boundaries that would prevent self-sufficiency in Monroe County.

We are striving, with your help, to make Monroe County a safe and thriving place for all of our residents.

Thank you for your consideration.

Sincerely,

*Contina Moore*

Contina Moore, County Director

Alonzo Sykes, *Alderman Ward 1*  
Wilchie Clay, *Alderman Ward 2*  
Sammy Burroughs, *Alderman Ward 3*  
Dean Irvin, *Alderman Ward 4*  
John Allen, *Alderman Ward 5*  
John Dudley Williams, *City Attorney*



Jackie Benson, *City Clerk*  
Henry O. Randle, *Chief of Police*  
Frank Gladney, Sr., *Fire Chief*  
Karen Crump, *City Comptroller*

**CITY OF ABERDEEN**  
CECIL BELLE, MAYOR

December 11, 2013

To whom it may concern:

The City of Aberdeen is joint owners with the county of the former GOP site and that it fully supports the brownfield assessment grant application and also the assessment activities that will be conducted if funding is awarded to the county, for the Prairie Ms site. At the October 15, 2013 this resolution was approved by the Board of Alderman.

**RESOLUTION AUTHORIZING THE PREPARATION OF A BROWNFIELD ASSESSMENT GRANT APPLICATION AND DESIGNATING THE AUTHORIZED REPRESENTATIVE FOR THE APPLICATION PROCESS**

**RESOLUTION AUTHORIZING THE PREPARATION AND SUBMISSION OF A BROWNFIELD ASSESSMENT GRANT APPLICATION TO THE MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY, DESIGNATING THE MAYOR AS THE OFFICIAL APPLICATION REPRESENTATIVE, AND AUTHORIZING THE MAYOR TO EXECUTE THOSE DOCUMENTS AND AGREEMENTS REQUIRED IN CONNECTION WITH THE GRANT APPLICATION.**

If you have any questions please feel free to contact me at 662-369-4165.

Thank you,

  
Cecil Belle, Mayor

## Attachment v) Documentation of Leveraged Funds



Tennessee Valley Authority, Post Office Box 282409, Nashville, Tennessee 37229

July 22, 2013

Mr. Thomas M. Hunter  
Executive Director  
Appalachian Regional Commission  
ATTN: Project Control  
1666 Connecticut Avenue Northwest, Suite 700  
Washington, District of Columbia 20009-1068

Dear Mr. Hunter:

**PROPOSED APPALACHIAN REGIONAL COMMISSION (ARC) PROJECT - MONROE COUNTY TRAFFIC INFRASTRUCTURE IMPROVEMENTS (HOMESTRETCH)**

We are pleased to notify you that the Tennessee Valley Authority (TVA) is willing to administer the proposed \$300,000, ARC grant to Monroe County, Mississippi, for the above-designated project.

The ARC grant will be administered in accordance with the terms of the Memorandum of Understanding between ARC and TVA under Contract No. TV-85102V, as amended. Our environmental and engineering reviews will be completed when additional information is received. Upon ARC approval we will move quickly to the contract and administration phase of this project.

TVA's administrative fee for this project (*paid from the state ARC allocation and not project funds*) is estimated to be \$7,500. Due to the nature of the project, TVA will have to complete an Environmental Assessment. National Environmental Policy Act (NEPA) regulations require a higher level of environmental review when disturbing "Greenfield" areas.

Please keep me and Bill Zotto advised of the progress of this project. I may be reached at (615) 232-6227 or by email at [psmcmullan@tva.gov](mailto:psmcmullan@tva.gov). Bill may be reached at (615) 232-6166 or by email at [blzotto@tva.gov](mailto:blzotto@tva.gov).

Sincerely,

Philip McMullan  
Program Manager

cc: Ms. Shelley Adams  
Project Manager  
Three Rivers Planning and Development District  
Post Office Box 690  
Pontotoc, Mississippi 38863-0690

Mr. Mike Armour  
Director  
Mississippi Appalachian Regional Commission Office  
Post Office Box 1606  
Tupelo, Mississippi 38802-1606

Mr. Billy Kirkpatrick  
President  
Monroe County Board of Supervisors  
201 West Commerce Street  
Aberdeen, Mississippi 39730

Ms. Julie Lawhorn  
Program Manager  
Appalachian Regional Commission  
1666 Connecticut Avenue Northwest, Suite 700  
Washington, District of Columbia 20009-1068

Ms. Sandra Perkins  
Associate Manager  
Mississippi Appalachian Regional Commission Office  
Post Office Box 1606  
Tupelo, Mississippi 38802-1606

Ms. Molly Theobald  
Program Manager  
Appalachian Regional Commission  
1666 Connecticut Avenue Northwest, Suite 700  
Washington, District of Columbia 20009-1068



**MISSISSIPPI DEVELOPMENT AUTHORITY  
SUBGRANT SIGNATURE SHEET**

**125**

**501 North West Street, 5th Floor (zip: 39201) • Post Office Box 849 (zip: 39205)  
Jackson, Mississippi**

**1. Recipient's Name, Address, and Telephone Number**

Monroe County  
Post Office Box 578  
Aberdeen, Mississippi 39730  
  
662.369.8143  
  
Duns # 030416986

**2. Effective Date:**

March 12, 2013

**3. Subgrant Number:**

1129-12-048-ED-01

**4. Grant Identifier: (Funding Source & Year)**

CDBG 2012 CFDA # 14.228

**5. Project Description:**

The scope of work for this project is to grant CDBG funds as specified under "Federal" in section eleven (11) of this contract to be used for **Building and Roof Improvements** as specified in the approved CDBG application and stated in additional supporting data contained in the application files.

**6. Beginning and Ending Dates:**

March 12, 2013 to March 12, 2016

**7. Subgrant Payment Method:**

Current Needs

**8. Number of Permanent, Full Time Jobs to be Created: 100**

Monroe County, the Subgrantee herewith commits to the Community Services Division, Mississippi Development Authority to the National Objective for this Community Development Block Grant project, which is making at least fifty-one percent (51%) of these jobs to be created by **United Furniture Industries, Inc** available to persons of low- and moderate-income as indicated in the agreement between the Subgrantee and the industry February 22, 2013.

**9. Page 1 of 25**

**10. National Objective:**

Low/Moderate Income

**11. The following funds are obligated:**

Federal	Other
\$1,323,363	\$1,503,336.70

**12. The subgrantee agrees to operate the program outlined in this subgrant in accordance with all provisions of this subgrant included herein. The following sections are attached and incorporated into this agreement:**

  x   General Terms and Conditions

  x   State of Mississippi Community Development Block Grant Assurances

  x   Special Conditions

  x   Budget                             Annex A

  x   Section Three Requirements

  x   Special Provisions Stipulated by HUD

  x   Financial Management, Report and Recordkeeping

  x   Federal Labor Standards Provisions

All policies, terms, conditions, and provisions of the current notebooks entitled *Community Development Block Grant Program*, *CDBG Implementation Manual*, and *CDBG Policy Statements* are also incorporated into this agreement, and Subgrantee agrees to fully comply therewith.

**13. Approved for Contractor:**

Signature

Name: Steven C. Hardin

Title: Director  
Community Services Division

Date

3/19/13

**14. Approved for Subgrantee:**

Signature

Name: Billy Kirkpatrick

Title: President, Board of Supervisors  
Monroe County

Date

3/22/13

U.S. Department of Homeland Security  
FEMA Region IV  
3003 Chamblee Tucker Road  
Atlanta, GA 30341



# FEMA

April 23, 2012

Mr. Robert R Latham, Jr., Director  
Mississippi Emergency Management Agency  
Post Office Box 5644  
Pearl, Mississippi 39208

Attention: Ms. Jana Henderson, SHMO

Reference: Hazard Mitigation Grant Program (HMGP) Project 1906-0012, Monroe County  
Access Family Health Care Medical Facility 361 Safe Room Project - Phase I

Dear Mr. Latham:

I am pleased to inform you that the project referenced above has been approved for \$97,500 with a Federal share of \$73,125. The project's non-federal share of \$24,375 will be provided by Access Health Care.

The following is the approved Statement of Work (SOW) for the above referenced project:

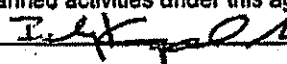
*Monroe County will construct a FEMA 361 safe room within the yet to be built Access Medical Center to accommodate 80 people within the medical facility. It will be 745 ft<sup>2</sup> and offer life protection to those in the medical facility. The safe room will be dual-purpose as a training room. Phase I will consist of schematic design, design development, construction documents, and bidding or negotiation.*

The Period of Performance (POP) for Phase I of this project is one (1) year from the date of this correspondence and shall end on April 20, 2013. All the activities specified in the scope of work should be completed and all Phase I deliverables submitted to FEMA no later than this date. In accordance with HMGP rules and policy, we will require the submittal of all closeout documentation, if the project is deemed unfeasible or not cost effective, within 90 days, no later than July 19, 2013.


Monroe County shall deliver to the Federal Emergency Management Agency (FEMA) through the Mississippi Emergency Management Agency for review and comment the following:

1. Engineering design and analysis, preparation of construction plans and bid documents
2. Certification that FEMA 361 standards will be met
3. Cost estimates to implement the designed project
4. Benefit-cost analysis required to determine cost effectiveness eligibility of the proposed project

<b>MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY ASSISTANCE AGREEMENT</b>		Assistance ID No. SW920	
		Date of Staff Approval 30-Apr-13	
<b>AGREEMENT TYPE</b>		Recipient Type	
Cooperative Agreement		COUNTY	
Grant Agreement	X	Tax ID No.	
Assistance Amendment			
<b>RECIPIENT</b> MONROE COUNTY BOARD OF SUPERVISORS P.O. BOX 578 ABERDEEN, MS 39730		<b>PROJECT MANAGER</b>  MIKE KING COUNTY ADMINISTRATOR	
<b>ISSUING OFFICE</b> MS DEPT. OF ENVIRONMENTAL QUALITY OFFICE OF POLLUTION CONTROL P. O. BOX 2261 JACKSON, MS 39225		<b>PROJECT MANAGER</b>  LUIS MURILLO SOLID WASTE POLICY, PLANNING AND GRANTS BRANCH	
<b>ASSISTANCE PROGRAM</b>  LOCAL GOVERNMENT SOLID WASTE ASSISTANCE PROGRAM		<b>STATUTORY AUTHORITY</b>  SECTION 17-17-65, MS CODE ANN.	
<b>PROJECT TITLE AND DESCRIPTION</b>  SOLID WASTE ENFORCEMENT OFFICER			
<b>PROJECT LOCATION</b>  CITY COUNTY MONROE STATE MS		<b>PROJECT PERIOD</b> The project period shall begin upon execution of the grant agreement by the Executive Director of MDEQ and end no later than <b>DECEMBER 31, 2014.</b>	
		<b>TOTAL PROJECTED PERIOD COST</b> \$ 19,296.00	
<b>FUNDS</b>	<b>Former Award</b>	<b>This Action</b>	<b>Amended Total</b>
MDEQ Amount This Action -- Allocated (4049)		\$ 19,296.00	
MDEQ Amount This Action -- Competitive (4050)			
Recipient Contribution		\$ 19,296.00	
Other Contribution			
Total Project Cost		\$ 38,592.00	
<b>APPROVED BUDGET</b>			
Personnel		\$ 19,296.00	
Indirect			
Travel			
Equipment			
Supplies			
Educational Material			
Construction			
Other			
Total Charges		\$ 19,296.00	
<b>METHOD OF PAYMENT</b>			
Advance			
Reimbursement	X		

<b>REQUEST FOR ADVANCE OR REIMBURSEMENT</b>  <i>(See instructions on back)</i>		OMB APPROVAL NO. 0348-0004		PAGE 1 OF 2 PAGES
		1. TYPE OF PAYMENT REQUESTED	a. "X" one or both boxes <input type="checkbox"/> ADVANCE <input checked="" type="checkbox"/> REIMBURSEMENT b. "X" the applicable box <input checked="" type="checkbox"/> FINAL <input type="checkbox"/> PARTIAL	2. BASIS OF REQUEST  <input checked="" type="checkbox"/> CASH <input type="checkbox"/> ACCRUAL
3. FEDERAL SPONSORING AGENCY AND ORGANIZATIONAL ELEMENT TO WHICH THIS REPORT IS SUBMITTED USDA-NRCS		4. FEDERAL GRANT OR OTHER IDENTIFYING NUMBER ASSIGNED BY FEDERAL AGENCY  68-4423-12-2326		5. PARTIAL PAYMENT REQUEST NUMBER FOR THIS REQUEST  1
6. EMPLOYER IDENTIFICATION NUMBER  64-6000844	7. RECIPIENTS ACCOUNT NUMBER : 9000021542 Routing No: 08420430	8. PERIOD COVERED BY THIS REQUEST FROM (month, day, year) 5/20/2012 TO (month, day, year) 6/15/2012		
9. RECIPIENT ORGANIZATION  Name: Monroe County  Number and Street : P.O. Box 578  City, State, Aberdeen, MS and Zip Code: 39730		10. PAYEE (Where check is to be sent if different than item 9)  Name:  Number and Street:  City, State, and Zip Code:		
11. COMPUTATION OF AMOUNT OF REIMBURSEMENTS/ADVANCES REQUESTED				
PROGRAMS/FUNCTIONS/ACTIVITIES▶	(a)	(b)	(c)	TOTAL
a. Total program (As of date) outlays to date	\$151,250.00			\$151,250.00
b. Less: Cumulative program income				
c. Net program outlays (Line a minus line b)	\$151,250.00			\$151,250.00
d. Estimated net cash outlays for advance period				
e. Total (Sum of lines c & d)	\$151,250.00			\$151,250.00
f. Non-Federal share of amount on line e	\$22,687.50			\$22,687.50
g. Federal share of amount on line e	\$128,562.50			\$128,562.50
h. Federal payments previously requested	\$0.00			\$0.00
i. Federal share now requested (Line g minus line h)	\$128,562.50			\$128,562.50
j. Advances required by month, when requested by Federal grantor agency for use in making pre-scheduled advances	1 <sup>st</sup> month			
	2 <sup>nd</sup> month			
	3 <sup>rd</sup> month			
12. ALTERNATE COMPUTATION FOR ADVANCES ONLY				
a. Estimated Federal cash outlays that will be made during period covered by the advance				
b. Less: Estimated balance of Federal cash on hand as of beginning of advance period				
c. Amount requested (Line a minus line b)				
AUTHORIZED FOR LOCAL REPRODUCTION (Continued on Reverse) STANDARD FORM 270 (Rev. 7-97) (If reimbursement is being requested, sign following certification.) Prescribed by OMB Circulars A-102 and A-110 I certify that, to the best of my knowledge, this bill has not been previously submitted and that program accomplishments will meet planned activities under this agreement. I have examined and certify that the payment is correct for payment.  Date: 8/10/12				
(If advance of funds is being requested, sign following certification.) I certify that, to the best of my knowledge, this advance is necessary to meet planned activities under this agreement. I have examined and certify that this request is correct for payment. _____ Date: _____				

## CERTIFICATION

I certify that to the best of my knowledge and belief the data on the reverse are correct and that all outlays were made in accordance with the grant conditions or other agreement and that payment is due and has not been previously requested.	SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	DATE REQUEST SUBMITTED August 6, 2012
	TYPED OR PRINTED NAME AND TITLE Billy Kirkpatrick, President of the Board	TELEPHONE (AREA CODE, NUMBER, EXTENSION) 662-286-7707

This space for agency use

Public reporting burden to this collection of information is estimated to average 60 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0004), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

## INSTRUCTIONS

Please type or print legibly. Items 1, 3, 5, 9, 10, 11e, 11f, 11g, 11i, 12 and 13 are self-explanatory, specific instructions for other items are as follows:

Item	Entry	Item	Entry
2.	Indicate whether request is prepared on cash or accrued expenditure basis. All requests for advances shall be prepared on a cash basis.		additional forms as needed and indicate page number in space provided in upper right; however, the summary totals of all programs, functions, or activities should be shown in the "total" column on the first page.
4.	Enter the Federal grant number, or other identifying number assigned by the Federal sponsoring agency. If the advance or reimbursement is for more than one grant or other agreement, insert N/A; then, show the aggregate amounts. On a separate sheet, list each grant or agreement number and the Federal share of outlays made against the grant or agreement.	11a.	Enter in "as of date," the month, day, and year of the ending of the accounting period to which this amount applies. Enter program outlays to date (net of refunds, rebates, and discounts), in the appropriate columns. For requests prepared on a cash basis, outlays are the sum of actual cash disbursements for goods and services, the amount of indirect expenses charged, the value of in-kind contributions applied, and the amount of cash advances and payments made to subcontractors and subrecipients. For requests prepared on a accrued expenditure basis, outlays are the sum of the actual cash disbursements, the amount of indirect expenses incurred, and the net increase (or decrease) in the amounts owed by the recipient for goods and other property received and for services performed by employees, contracts, subgrantees and other payees.
6.	Enter the employer identification number assigned by the U.S. Internal Revenue Service, or the FICE (institution) code if requested by the Federal agency.	11b.	Enter the cumulative cash income received to date, if requests are prepared on a cash basis. For requests prepared on an accrued expenditure basis, enter the cumulative income earned to date. Under either basis, enter only the amount applicable to program income that was required to be used for the project or program by the terms of the grant or other agreement.
7.	This space is reserved for an account number or other identifying number that may be assigned by the recipient.	11c.	Only when making requests for advance payments, enter the total estimated amount of cash outlays that will be made during the period covered by the advance.
8.	Enter the month, day, and year for the beginning and ending of the period covered in this request. If the request is for an advance or for both an advance and reimbursement, show the period that the advance will cover. If the request is for reimbursement, show the period for which the reimbursement is requested.	13.	Complete the certification before submitting this request.
Note:	The Federal sponsoring agencies have the option of requiring recipients to complete items 11 or 12, but not both. Item 12 should be used when only a minimum amount of information is needed to make an advance and outlay information contained in item 11 can be obtained in a timely manner from other reports.		
11.	The purpose of the vertical columns(a), (b), and (c) is to provide space for separate cost breakdowns when a project has been planned and budgeted by program, function, or activity. If additional columns are needed, use as many		

Attachment vi) Justification for Waiver of \$200,000 Limit  
for a Site-Specific Assessment

## Justification for Waiver of \$200,000 Limit for a Site-Specific Assessment

Monroe County is requesting a waiver of the \$200,000 limit for a site-specific assessment on the 307-ac former Gulf Ordnance Plant (GOP) parcel which the county owns jointly with the City of Aberdeen. Within the bounds of the 307-ac parcel, was the GOP "metals plant," the possible burial of 100-lb practice bombs, and a 100-lb bomb manufacturing line. The "metals plant" also known as Prairie Metals & Chemical Co (EPA ID MSD980839898) was proposed for National Priorities List (NPL) status in 1984. After a removal action, a site inspection resulted in the site being classified as No Further Remedial Action Planned (NFRAP) on March 31, 1986 because it didn't qualify for the NPL. Additionally there are numerous former bunkers located on the site. According to a 2007 Site Investigation (SI) Report completed for the U.S. Army Corps of Engineers (USACE), Mobile District for the entire former GOP, recommendations for areas within the County's 307-ac parcel include: a Remedial Investigation(RI)/ Feasibility Study (FS) with additional sampling for explosives in the 100-lb bomb line area because pieces of trinitrotoluene (TNT) and nitrocellulose or nitroglycerin were found during a site visit for a 1991 Preliminary Assessment (PA); a geophysical survey in the area where 100-lb bombs are possibly buried, and an RI/FS near the former Storage/Machine Shop area because the explosive pentaerythritol tetranitrate (PETN) was identified in surface soil as well as the metals antimony, copper, lead and zinc. Adjacent to the County's 307-ac parcel, there was formerly a manufacturer of a pesticide for red ants. The County has concerns that there may be impacts to the County's parcel from the pesticide manufacturer.

The Phase II ESA on this site will be very expensive for several reasons:

- The site is large (307 ac) with activities involving differing hazardous substances taking place in various locations throughout the site.
- Because of the potentially buried bombs, a Ground Penetrating Radar (GPR) survey is required. There are also mounds in this naturally flat terrain that indicate the previous burial of other debris in various areas of the site. The majority of the site has remained abandoned since the GSA transferred the property to Monroe County and the City of Aberdeen. Over time it has become overgrown with shrubs and small trees. Clearing and grubbing for a portion of the site will be required before the GPR survey can be performed. Our opinion of cost for clearing and grubbing is \$17,000 for 40 ac. The GPR survey can run up to \$1500-\$2000/day. We have estimated that we'll need 15 days of on-site GPR for a cost of between \$22,500 and \$30,000.
- Analysis for explosives can range between \$120 and \$300 per sample. Our estimate for surface soil, subsurface soil and groundwater analyses for explosive, VOCs, SVOCs, metals, and pesticides (from the formerly adjacent pesticide site) is \$61,000

## Attachment x) Other Factors Checklist



## Other Factors Checklist

Name of Applicant: Monroe County, Mississippi

	Other Factor	Page #
	Community population is 10,000 or less	
	Federally recognized Indian Tribe	
	United States territory	
	Applicant will assist a Tribe or territory	
	Targeted brownfields sites are impacted by mine-scarred land	
	Targeted brownfields sites are contaminated with controlled substances	
X	Recent natural disasters(s) (2006 or later) occurred within community, causing significant community economic and environmental distress	1
X	Project is primarily focusing on Phase II assessments	8-9
X	Applicant demonstrates firm leveraging commitments for facilitating brownfields project completion by identifying amounts and contributors of funding in the proposal and have included documentation	10
	Community experienced manufacturing plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant closures due to bankruptcy or economic disruption.	
X	Recent (2008 or later) significant economic disruption ( <u>unrelated</u> to a natural disaster or manufacturing/auto plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base	1, 5
	Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant that is directly tied to the project area, and can demonstrate that funding from a PSC grant has or will benefit the project area. To be considered, <u>applicant must attach documentation</u> which demonstrates this connection to a HUD-DOT-EPA PSC grant.	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant	
	Community is implementing green remediation plans.	
	Climate Change (also add to "V.D Other Factors")	